



eLiberare's Safeguarding Policy

Date of last review: January 2025

Date of next review: January 2026

1. Vision

eLiberare Association has for over 10 years made the safety of the beneficiaries of its programmes as well as the safety of the employees of its programmes of utmost importance in the way it has conducted its anti-trafficking work. We offer specialized services to victims of crimes, especially victims of human trafficking, as well as prevention info sessions to communities, and training to a variety of professional categories.

While the concept of safety itself has broader implications, safeguarding will in the context of this policy be conceived as protecting against abuse, that is, against physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking and harmful practices.

In many cases, eLiberare has sought to furthermore carry its safeguarding forward into the communities it serves. It has done so by example, through dialogue and by tailored programmes.

eLiberare sees the fight against physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices as one of its primary tasks closely connected to its core values of empathy, integrity, respect, and excellence. eLiberare also knows that if it guards the safety of its people and the communities it serves, its anti-trafficking work will be more effective.

eLiberare has articulated this commitment to safeguarding at the level of its mission, values, and code of conduct. It is a vital element in the induction of new employees.

The leadership of eLiberare has during these eleven years consistently reinforced the importance of safeguarding and has led by example. Its Boards have been vigilant, its management persistent.

In this policy, eLiberare will bring together safeguarding principles, standards of behavior, and safeguarding practices. The description of all safeguarding practices has developed in the last 10 years, and although in the past eLiberare has not done enough to document the way it safeguard, it will rectify that in this policy and in future studies and publications.





2. Definitions

Bullying is the act of seeking to harm, intimidate, or coerce someone who might be in a position of vulnerability.

Case management - following the appropriate policies and procedures to deal with a report of a safeguarding concern up to its final resolution.

Child - any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Child Protection - preventing and responding to neglect, violence, exploitation and abuse against children - including (but not limited to) commercial sexual exploitation, trafficking, child labour and harmful traditional practices.

Code of Conduct - a set of norms or standards about behavior that staff of eLiberare are obliged to adhere to.

Confidentiality - an ethical principle that restricts access to and dissemination of information. In investigations, it requires that information is available only to a limited number of authorized people for the purpose of concluding the investigation.

Consent is the act of agreeing to do something or giving the permission for something to happen. **Informed consent** is voluntarily and freely given, without any type of coercion, thus the individual concerned must be fully informed about the action and the consequences of it. Children's informed consent should be voluntary with the informed consent of the child and a parent or guardian. Persons with disabilities may need specific support based on the nature of their impairment whether it be physical, intellectual, or mental, to give consent.

Contractors - individuals, organizations or companies that have been contracted to deliver specific services.

Corruption refers to the abuse of entrusted power for private gain, often involving dishonest or unethical behavior by individuals in positions of authority or influence. It can take various forms: **Bribery** - offering, giving, receiving, or soliciting something of value (money, gifts or favors) to influence the actions of individuals; **Embezzlement** - misappropriation or theft of funds, assets, or resources by individuals entrusted with their management or stewardship for personal gain; **Fraud** - Deception, misrepresentation, or manipulation of information or processes to obtain financial or personal benefits dishonestly; **Nepotism and cronyism** - favoritism shown to family members, friends, or associates in appointments, promotions, contracts, or other decisions, often at the expense of merit or fairness; **Conflict of interest** - situations where individuals in positions of authority or influence have personal, financial, or other interests that may improperly influence their decisions or actions; **Extortion or Racketeering** - coercion, threats, or intimidation used to extract money, property, or services from others, often through the abuse of power or violence.





Discrimination refers to the unjust or prejudicial treatment of individuals or groups based on certain characteristics or traits, such as race, ethnicity, gender, age, sexual orientation, religion, disability, socioeconomic status, or other protected characteristics.

Emotional abuse - also known as **psychological violence**, is a form of maltreatment characterized by behaviors or actions that cause harm to an individual's emotional well-being, self-esteem, and mental health. **Verbal abuse** includes yelling, name-calling, insulting, belittling, or using derogatory language to demean or intimidate the victim. **Gaslighting** is a manipulative behavior aimed at making the victim doubt their perceptions, memories, or sanity, often resulting in confusion, self-doubt, and a sense of powerlessness. Long-term consequences may include depression, anxiety disorders, post-traumatic stress disorder (PTSD), substance abuse, self-harm, or suicidal thoughts and behaviors.

Enquiry is an internal analytical process designed to gather information in order to determine whether wrongdoing occurred and, if so, the persons or entities that are responsible. The term **investigation** can also be used.

Exploitation refers to the act of taking advantage of someone for personal gain, often at the expense of the exploited individual's well-being, rights, or dignity.

Focal Point - a person whose responsibilities include coordinating eLiberare's safeguarding prevention, mitigation, and response work.

Forced labor - refers to situations in which individuals are coerced or compelled to work against their will, often through threats, violence, deception, or other forms of coercion.

Gender-Based Violence - An umbrella term for violence directed toward or disproportionately affecting someone because of their actual or perceived gender identity. The term is also used to describe targeted violence against lesbian, gay, bisexual, transgender, queer, intersex, and asexual (LGBTQIA+) populations. In these cases when referencing violence related to norms of masculinity/ femininity and/or gender norms.

Harm or maltreatment caused by an eLiberare's staff, operations, or programmes is personal physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking and harmful practices.

Humiliation refers to the act of causing someone to feel shame, embarrassment, or degradation, often through words, actions, or behaviors that undermine their dignity or self-worth. **Verbal humiliation** includes mocking, belittling, ridiculing, or insulting someone through spoken or written words. **Public humiliation** occurs when someone is subjected to embarrassment or shame in front of others, whether intentionally or unintentionally. **Physical humiliation** involves actions that





cause physical discomfort or embarrassment, such as forcing someone to perform demeaning tasks or engaging in physical acts of aggression.

Incident is an event or an occurrence that took place on a given date, including a period of several dates, on which the reported breach of the safeguarding standards took place.

Intimidation - Using threats, gestures, or menacing behavior to instill fear and control over the victim, creating a climate of intimidation and coercion.

Neglect refers to the failure to provide necessary care, attention, or support to individuals who are dependent on others for their well-being.

Online sexual abuse refers to the exploitation, harassment, grooming, or coercion of individuals, particularly minors, through digital communication channels and internet platforms. It encompasses a wide range of harmful behaviors, including but not limited to: **Grooming** - predators may use online platforms to establish relationships with minors, gaining their trust and manipulating them into engaging in sexual activities or providing sexually explicit material; **Sextortion** - perpetrators may coerce individuals, often minors, into providing sexually explicit images or videos; **Cyberbullying** - use of digital communication tools to harass, intimidate, or humiliate others, including through the dissemination of sexually explicit content or threats of sexual violence; **Child sexual abuse material (CSAM)** - the distribution, possession, or production of child sexual abuse material; **Unwanted exposure to pornography** - minors may be exposed to sexually explicit material online without their consent, leading to confusion, distress, or desensitization to sexual content.

Partner refers to institutions, organizations, agencies, companies, foundations, trusts, independent actors or inter-agency groups which are in a contractual relationship with eLiberare for the purpose of implementing programmes and projects or providing funding.

Physical abuse is a form of maltreatment or violence that involves the intentional use of force against another person, resulting in physical harm, injury, pain, or impairment. It can manifest in various forms, including hitting, slapping, kicking, punching, pushing, choking, burning, or using objects to inflict harm. It can also involve restraining or confining a person against their will, depriving them of food, or medical care, or subjecting them to physical exertion.

PSEA (protection from sexual exploitation and abuse) - measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

Safeguarding covers prevention, mitigation, and response actions to address the full range of personal physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.





Sexual abuse - actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse.

Sexual assault - Sexual activity with another person who does not consent. It is a violation of bodily integrity and autonomy and is a broader conception of rape. It does not necessarily entail penetration.

Sexual exploitation - involves any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made in a condition of employment or creates an intimidating, hostile or offensive working environment.

Sexual harassment - involves any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made in a condition of employment or creates an intimidating, hostile or offensive working environment.

Suppliers - organizations or companies that have been contracted to provide goods, equipment and other supplies used by the organization, including for the delivery of programmes and projects.

Survivor is a person who has experienced maltreatment or harm committed by a staff member or associate or that was caused by eLiberare's operations and programmes. The survivor may be a staff member or a member of the community - child or adult. The term **victim** might also be used.

3. Scope and Purpose

eLiberare is committed to safeguarding. It wants to protect all its employees and beneficiaries against abuse, that is, against physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

eLiberare is an

eLiberare also recognizes that some of its people are more at risk. It is with that in mind that eLiberare recognizes nine different categories within its people that are more at risk than others and therefore deserve extra efforts to protect them. The nine categories are: children, adolescents, adults with special needs, women, elderly, individuals from the LGBTIQ+ community, and migrants among the beneficiaries; adults with special needs and women among the employees. eLiberare will not hesitate to add other general categories to this list in future if it





concludes that this is necessary. eLiberare will also at the level of specific programmes or assistance offer extra protection to the people outside these categories whenever that is needed.

eLiberare acknowledges that its safeguarding responsibilities do not end at the boundaries of its programmes and enterprises. It has sought and will continue to seek a dialogue with partners, suppliers and client organizations about safeguarding. It will include conditions about safeguarding in the contractual relations it enters into. It will react with severity if those conditions are not met or broken. eLiberare will also continue to reach out into the communities it works and to the beneficiaries it serves to fight sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

All of the above means that this safeguarding policy applies to all cases within eLiberare where employees abuse other employees or additional staff, where employees or additional staff abuse beneficiaries, where beneficiaries abuse employees, and the cases where beneficiaries abuse other beneficiaries within eLiberare's span of control or sphere of influence.

This policy applies equally to:

- The board of trustees
- All staff contracted by eLiberare (under any contractual mechanism)
- Associated personnel whilst engaged with work or visits related to eLiberare, including but not limited to: auditors, trainers, consultants, volunteers, contractors, donors, journalists, staff relatives, researchers, and politicians.

It applies during or outside working hours, every day of the year.

4. Principles

Our organization is committed to protecting the safety, wellbeing, and dignity of all individuals who come into contact with our work, particularly children, young people, and vulnerable adults. These principles form the foundation of our safeguarding approach and inform all our safeguarding policies and procedures.

We believe that everyone has the right to live free from abuse, exploitation, and harassment. Our safeguarding principles reflect this fundamental belief and guide our actions:

1. Zero Tolerance

We maintain a zero-tolerance approach to abuse, exploitation, and harassment in all forms. Any verified breach of our safeguarding policies will result in appropriate disciplinary action, up to and including termination of employment or association with our organization. We commit to do no harm to any child, or adult.





2. Best Interests of the Vulnerable

All decisions and actions regarding safeguarding will prioritize the best interests of children, young people, and vulnerable adults. This includes considering the specific needs, rights, and wishes of individuals from different cultural backgrounds and those with disabilities. All children have equal rights to protection from harm. All actions on child safeguarding are taken in the best interest of children, which are paramount.

3. Shared Responsibility

Safeguarding is everyone's responsibility. All staff members, volunteers, partners, and associates must understand, sign, and adhere to our safeguarding policies and procedures. Leadership will model these principles and ensure their implementation throughout the organization. Everybody has a responsibility to support the protection of children.

4. Prevention

We are committed to creating an organizational culture and implementing measures that prevent abuse, exploitation, and harassment. This includes robust recruitment procedures, regular training, and clear reporting mechanisms.

5. Empowerment and Participation

We will actively involve and consult with the communities we serve, including children and vulnerable adults where appropriate, in developing and implementing our safeguarding measures. We recognize that individuals are experts in their own experiences and needs.

6. Confidentiality and Information Sharing

We will handle all safeguarding concerns with utmost confidentiality, sharing information only on a need-to-know basis and in compliance with data protection regulations. However, the duty to protect vulnerable individuals will take precedence when safety is at immediate risk.

7. Accountability and Transparency

We will be transparent about our safeguarding policies and procedures, regularly review their effectiveness, and be accountable for our actions. We commit to reporting serious safeguarding incidents to relevant authorities and donors as required by law and contractual obligations.

8. Partnership Approach

We will work collaboratively with other organizations, local authorities, and communities to strengthen safeguarding practices. We expect our partners to meet our safeguarding standards and will support them in developing their capacity where needed.





9. Cultural Sensitivity

While maintaining our core principles, we will implement safeguarding measures in a culturally sensitive manner, recognizing and respecting different cultural contexts while ensuring that this does not compromise the safety and wellbeing of vulnerable individuals.

10. Continuous Improvement

We commit to regularly reviewing and updating our safeguarding approaches based on lessons learned, emerging best practices, and feedback from stakeholders. We will maintain an open learning culture where concerns can be raised and discussed constructively.

5. Responsibilities

5.1. All eLiberare Employees and Related Personnel

All eLiberare employees and related personnel share an obligation to prevent, report and respond to physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices. It is the responsibility of all eLiberare employees and related personnel to uphold eLiberare`s safeguarding policy and safeguarding Code of Conduct. All eLiberare employees and related personnel must read this policy and sign the Code of Conduct.

5.2. Safeguarding Team

The safeguarding team has a person from each department of eLiberare and at least one survivor of human trafficking.

This policy will be reviewed annually by the eLiberare Safeguarding team, or when there are changes in applicable legislation and/or regulatory guidance, afterwards being approved and endorsed by the eLiberare Board of Directors. This document will also be reviewed by the eLiberare Safeguarding team after any safeguarding incident is reported and investigated.

Every time the safeguarding policy is reviewed a risk assessment has to be done by the Safeguarding team. The safeguarding team will also add the conclusions regarding changes in the policy to the safeguarding training, to inform the staff.

eLiberare`s safeguarding team is responsible for investigating any abuse or exploitation complaint made.





5.3. Managers, Supervisors and Human Resource Officers

Managers, Supervisors and human resource officers must ensure that all eLiberare employees and related personnel understand and comply with eLiberare's safeguarding policy and sign the Code of Conduct. They are responsible for robust safe recruitment and induction, and ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises. Managers will ensure performance management of staff supports an accountable and safe organisational culture to prevent physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

5.4. Safeguarding Focal Point

The Safeguarding Focal Point is the person who is coordinating the safeguarding team in all the activities the team is responsible for.

The focal Point receives the complaints/ reports that are coming through the reporting channels, is responsible for the investigation process - to be thorough, victim-centered, and done in a timely manner - and shares the Final Report to the board of directors.

For eLiberare the Focal Point is Andreea Spătaru, andreea@eliberare.com.

5.5. Executive Director, Financial Director, Programmes Director

The board of directors must provide clear guidance and demonstrate how the organization, across its operations, will make every effort to protect all people from physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

The directors must ensure that culturally appropriate, safe and accessible, community-based reporting mechanisms are developed, implemented, and monitored and reviewed for effectiveness. This includes awareness raising with programs participants and eLiberare employees and related personnel about protection from physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

Directors lead eLiberare's work with partners to ensure appropriate support, assessment, and monitoring of partner commitments in relation to this Policy.

The Executive Director must ensure that all staff with specialized duties towards this policy have the appropriate experience, training and support available to them, including staff responsible for receiving and handling complaints and staff responsible for investigations. The Executive Director will also make every effort to ensure that complaints handling, and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary.





The Directors are responsible for ensuring that good quality and appropriate survivor support services are made available in their location.

5.6. The Board

The Board of eLiberare is accountable for this Safeguarding policy and requires from leadership regular reports on policy implementation and risks to inform their guidance for the organization.

6. Legal Framework

This Child Protection Policy is based on Keeping Children Safe Child Safeguarding Standards; the UN Convention on the Rights of the Child, 1989 (and its optional protocols); the UN Statement for the Elimination of Sexual Abuse and Exploitation and all child-related UN conventions.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in Romania, including the Safeguarding Vulnerable Groups Act 2006 and Charity Commission guidance. eLiberare has also taken into account international good practice in safeguarding in preparing this policy.

Among them we mention: Law No 202/ 2002 on Equal Opportunities and Treatment between women and man; Criminal Code - Articles 223 and 229; National Strategy for prevention and combating sexual violence 2021-2030, Government Decision No 592, 2021; Labour Code, Article 242; Law No 78/ 2014; PL-x no 219/ 2022, following the EU Directive 2019/ 1937; Law no 290/ 2004; Law no 118/ 2019; Council of Europe Convention on Preventing and Combating violence against women and domestic violence; Law no 272/2004;

7. Review & Approval

This policy will be reviewed annually by the eLiberare Safeguarding team, or when there are changes in applicable legislation and/or regulatory guidance, afterwards being approved and endorsed by the eLiberare Board of Directors. This document will also be reviewed by the eLiberare Safeguarding team after any safeguarding incident is reported and investigated.

Every time the safeguarding policy is reviewed a risk assessment has to be done by the Safeguarding team, and reviewed by the Executive Director. Risk assessment is a systematic process of identifying, evaluating, and managing risks related to the safety, well-being, and protection of vulnerable individuals.

The safeguarding team has a person from each department of eLiberare and at least one survivor of human trafficking. The assistance team and the training team constantly asks for feedback on feedback forms and the risk assessment is informed by those feedbacks. People also have other





means of giving feedback, an email address available on the website, a text line and an online anonymous form.

The risk assessment should involve analysis on the risk of physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices for every project, programme and activity. If risks are present in a process and they are insufficiently mitigated, the safeguarding team will proactively undertake an in-depth analysis of risks and risk-enhancing factors. That analysis will be based on dossiers, observations and interviews. It will result in recommendations to redesign the work process and/or to add or change safeguarding mechanisms. This can also happen within eLiberare`s staff, if an individual may be at risk of harm.

The safeguarding team will also add the conclusions to the safeguarding training.

8. Prevention Measures

8.1. Safe Recruitment and Selection

eLiberare will ensure it assesses the eligibility of candidates from a safeguarding perspective.

The following will be considered when planning recruitment:

- Job descriptions for all positions - make reference to responsibilities for safeguarding and/or the Code of Conduct and include the beliefs and values of the organization or link to them.
- Advertisement - make clear eLiberare`s commitment to safeguarding.
- Shortlisting - obtain and scrutinize information in applications/ CVs - resolve any gaps, discrepancies or anomalies in employment history.
- Interviews - include questions around safeguarding, the Code of Conduct and working with children, adolescents, adults with special needs, women, migrants, LGBTIQ+ community. Making sure the job description matches with qualifications of the candidate.
- Self-disclosure - the candidates will sign a self-disclosure form stating that they have not been involved in any crime, illegal act, sexual harassment or child abuse case previously.
- Background/ reference checks - verify the successful applicant`s identity, their employment history, and qualifications. Offers should not be confirmed until all checks have been completed.
- External checks - criminal record police verification and Integrity Certificate required.

8.2. Safeguarding Awareness and Training

eLiberare commits to disseminate its safeguarding policy in various formats. This includes:

- 1) Making our policy available online
- 2) Making it available in local languages
- 3) Making it available in appropriate formats.





4) Developing a child friendly version of the policy.

eLiberare will make safeguarding an important element of the education and training of its staff. It will do that both in the induction of all employees and in the training of professionals for specific functions.

- Every new hire will receive a brief introduction to the vision, mission and values of eLiberare the Code of Conduct (CoC) and the Safeguarding Policy and duly acknowledge all of these as part of their induction, and signing the CoC. They will also be enrolled in taking a Trauma Course. The team manager is in charge with the induction process, and the safeguarding focal point will overview the process.
- eLiberare safeguarding team is committed to ensuring that aspects of safeguarding that are relevant to specific work processes are always part of the professional training of all staff and that, when needed, this training will be repeated.
- eLiberare Board of Directors will continue to make sure that the professionals who handle the cases and complaints have competencies in line with the highest standards and best practices.
- eLiberare safeguarding team will regularly across the programmes and projects organize campaigns to create awareness about safeguarding. The campaigns will be precisely targeted and tailored to ensure that they are relevant to the staff and participants in question. They will have a very varied character.
- staff with responsibilities relating to child safeguarding and the focal point will be provided with a more in-depth training within 6 months of their engagement.

8.3. Code of Conduct

The Code of Conduct (*see Annex 1*) needs to be signed, internalized and followed by every employee and volunteer of the organization. The team managers are in charge of the induction process, and the safeguarding focal point will overview the process. The eLiberare Safeguarding team is in charge of revising and updating the Code of Conduct as needed every time this policy is revised.

The following standards of behavior are excerpts from the Code of Conduct and the minimum requirements for all employees and associate personnel (which can include volunteers) with regard to safeguarding and with regard to the prevention of abuse, that is physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

Employees and associated personnel of eLiberare must:

- Follow the Safeguarding Code of Conduct





- Anticipate risks for fellow employees or participants of being abused, that is, being sexually harassed, intimidated or assaulted, bullied, humiliated or discriminated against, neglected or exploited and take steps to mitigate those risks.
- Avoid being placed with children or with adolescents who are participants or under age, or with adults with special needs who are participants, in a compromising position. The adult is always considered responsible even if the child or adolescent or adult with special needs has initiated sexual interaction.
- Stop immediately any abuse they witness, if at all possible.
- Report any abuse they witness or have reliable information about.
- Treat everybody with respect.
- Respect everyone's privacy.

Employees and associated personnel of eLiberare must not:

- Violate the Safeguarding Code of Conduct
- Physically assault anybody
- Threaten anybody
- Hit children and adolescents to discipline them
- Bully, humiliate anybody
- Discriminate against anybody, for example, based on religion, gender, sexual orientation, race, skin color, age, ethnicity, caste, etc.
- Have any sexual interactions with participants and beneficiaries of eLiberare's programmes or other partner's programmes.
- Have any sexual interaction with fellow employees or partner organizations in exchange for money, goods or favors or based on any form of coercion.
- Neglect children, adolescents and adults with special needs who are entrusted to their care
- Exploit children or other beneficiaries or fellow employees in any form
- Bring children or other beneficiaries or fellow employees into a situation where they can be abused or exploited by third parties.

8.4. Ethical Use of Media and Images

eLiberare will always portray any individuals they are working with in a respectful and appropriate manner.

When we are conducting training sessions, we are posting group photos, making sure no one's face is easy to recognize.

eLiberare will not post photos of victims assisted with services, nor will it make public any personal data of theirs.

Guidelines on the use of images are included in the Code of Conduct.





Staff must not receive, display, or transmit pornography or obscenity. Using organization systems for any forms of violence, abuse or exploitation such as pornography is strictly prohibited and staff has to report if any of the guidelines are violated by any staff member.

8.5. Management and Prevention

Within eLiberare, team managers have direct responsibility for preventing abuse. They have to make sure that safe mechanisms are implemented and maintained. They have to make sure that employees are familiar with the ethos of eLiberare and with the general and relevant specific safeguarding policies.

Team managers have a unique responsibility to stop abuse. They are the ones that are in the position and have the power to make sure that it ends, by creating a team culture that prevents it, by recognizing it and reporting it to the safeguarding focal point.

It is a vital element of prevention that the management team in a visible manner takes responsibility for safeguarding.

9. Safe Partnering

eLiberare aims to safeguard while working with beneficiaries through partner organizations (suppliers, vendors, downstream partners, consultants, etc.)

Wherever eLiberare is working with, funding, or supporting other partner organizations to work directly with beneficiaries, the provision of this policy and guidance should be reflected in the partnership arrangements, through a clause that specifically states that safeguarding is ensured:

"The parties undertake to take all necessary measures to prevent any situation of abuse or exploitation of any kind on the part of employees or other categories of collaborators or providers involved in carrying out the activities/providing the services of this contract. Any acts or gestures of a sexual nature, expressed or implied, which have a degrading, abusive, coercive character towards any other person, or which may affect a person's sexual freedom or rights, are prohibited. The parties understand that this provision constitutes an essential obligation established by the parties in the contract, and that they are responsible for ensuring compliance with these provisions in all contracts entered into to implement the object of this contract. Any violation or limitation of the obligations in this clause leads to the initiation of applicable legal proceedings (criminal and civil)."

These partners should commit to implement this policy and to the safeguarding of beneficiaries against abuse, that is against physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.





In general, partners are required to have their own safeguarding policy in place, but if they do not have a safeguarding policy, the eLiberare safeguarding policy will govern any concerns or incidents.

If a case of abuse within a partner organization comes to its attention, eLiberare will always act to make sure that the abuse is stopped and the case is followed up in an adequate manner.

10. Implication of Non-Compliance

eLiberare has zero tolerance for any form of abuse and exploitation. Eliberare reserves the right to refuse employment offers to staff, volunteers/ interns, if they are deemed to pose a risk to any segment of the population that the organization is engaged with.

Similarly, if any consultants/ resource person, visitors, implementing partners, contractors, suppliers and any other individuals working for or representing eLiberare are found to be engaged, or suspected of being engaged in any activity that can harm or put on risk of abuse or exploitation will be reported to the relevant authorities or their employer, and stop partnering with.

11. Safeguarding Concerns Reporting Processes

eLiberare has zero tolerance for any form of abuse and exploitation. Eliberare reserves the right to refuse employment offers to staff, volunteers/ interns, if they are deemed to pose a risk to any segment of the population that the organization is engaged with.

Similarly, if any consultants/ resource person, visitors, implementing partners, contractors, suppliers and any other individuals working for or representing eLiberare are found to be engaged, or suspected of being engaged in any activity that can harm or put on risk of abuse or exploitation will be reported to the relevant authorities or their employer, and stop partnering with.

eLiberare has a 'zero tolerance' stance towards fraud, bribery and corruption. Employees/ subcontracted personnel or any associated partners must immediately report any suspected or actual instances of fraud, bribery or corruption.

No employees/ subcontracted personnel or any associated partner is allowed to claim, promise or offer gifts, commissions or other benefits in order to obtain any kind of benefit.

eLiberare has created a reporting system for abuse (and other violations) with several channels that complement each other. These channels are known throughout the organization and its programmes.

The first channel is the management team, consisting of the board of Directors and team of managers. The management team is aware that they have to intervene to stop abuse and that they have to report all cases to the focal point. If a staff reports a concern to their manager, the manager is expected to immediately notify the Safeguarding focal point. Cases of suspected abuse reported up to them are always followed up. This is to be done face to face.





The second channel makes it possible to bypass management and reach the safeguarding team directly. The channel operates both a 24/7 phone number (+40757749845), a dedicated email address (asistenta@eliberare.com), an online form available on the website, or a physical anonymous form available in all our fixed and mobile work points. Cases of violations reported through this channel are always followed up. The identity of the complainant is protected. These channels are publicly available on eLiberare's website alongside definitions of various forms of abuse and exploitation and instructions on what kind of information a report must contain.

The data a person should submit in the initial reporting (please see Annex 4 below - that will be available as a form on our website www.eliberare.com, at the safeguarding section) are:

- personal information (name, phone no) - if they wish to be contacted; if not, they can leave the section blank.
- Details on the person affected, relationship to the person, and contact information
- Details of the incident: who was involved, what happened, when and where, who are the eyewitnesses
- Description of any injuries or needs of assistance
- Existence of any physical evidence
- Selection of one of the three types of information they are sharing: fact, opinion, hearsay

Safeguarding related complaints shall be shared by the safeguarding focal point to the Executive Director within 24 hours of the incident being recorded. Updates on investigation shall be shared within 5 days.

Final Decision shall be shared with the Board of Directors within a week.

12. Whistleblowing

The third channel of reporting is a whistleblower channel, that makes it possible to bypass all the other channels and go directly to the chairwomen of the organization: ioana@eliberare.com.

eLiberare has zero tolerance for fraud, corruption, financial misconduct, or other unethical practices.

eLiberare is committed to integrity, ethical conduct, and accountability, and will make complainants and whistleblowers feel protected and appreciated. We strictly prohibit retaliation or victimization against whistleblowers for making reports in good faith, and therefore they will not be subjected to harassment, discrimination, disciplinary action, termination of employment, or other forms of retaliation as a result of their whistleblowing activities.

Whistleblowers will be offered support and assistance as needed throughout the investigation process, including access to counseling, legal advice, advocacy, and protection from reprisals.





13. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times.

A Protocol for confidentiality will be signed with every person involved in the investigation.

Annex 2 of this policy is the Agreement for processing of personal data and Annex 3 is the Confidentiality Agreement. Both are used also with every person eLiberare is offering its services to.

The standard Contract also stipulates in summary that data protection is mandatory between the parties during and after the duration of the Contract, for a period of 12 months. If any party is to promote the partnership, it has to be by name and a short description of the collaboration terms, without any specific details as to where and who.

Any financial, technical, artistic, product and launching data, or any other information relevant to the market position are strictly confidential and are the property of the party who offers that information to the other party.

The confidential information can be shared only after the written consent of the other party or in the situation that the other party already made it public. Another exception is in case a state authority specifically asks for the information, under the legal bindings of the law.

14. Investigation

eLiberare`s safeguarding team is responsible for investigating any abuse or exploitation complaint made.

Complaints related to abuse and exploitation will be logged in a register of complaints.

All documentation on cases will be stored securely and confidentially and only shared with those involved in working on the case, or the authorities if the need arises.

If there is an emergency, immediate call to emergency no 112 is to be made.

If a child's well being is at risk, calls to social services at 119 hotline are required.

If there is no immediate risk of harm, the safeguarding team should assess if the specific abuse or incident is a crime specifically addressed by the national law system. If yes, the focal point should immediately call the police and let the appropriate authorities investigate the case.

If there is no crime committed, the focal point will name two members of the team to conduct the internal investigation. If, at any point in the investigation, facts will show there was a crime committed, the team will report to the focal point and the focal point will then contact the police department.





Throughout the investigation and afterwards eLiberare will provide assistance and support services to the survivor, as needed. Decisions regarding support will be led by the survivor.

Within the next three days, the investigation team will conduct interviews with the complainant, the alleged perpetrator(s), witnesses, and any other relevant individuals to gather information and evidence. They will use both closed and open questions according to the standard investigation form and active listening techniques to elicit accurate and detailed responses from interviewees. They will document all interviews, statements, and evidence collected during the investigation in a thorough and transparent manner and they will present this to the focal point.

The focal point and the investigation team reviews documentation and records, such as incident reports, medical records, personnel files, and surveillance footage, to corroborate witness statements and identify any patterns or inconsistencies.

The safeguarding team will then evaluate the credibility and reliability of the information obtained during the investigation, taking into account factors such as consistency, corroboration, motive, and demeanor of witnesses.

The safeguarding team will consider the perspectives and experiences of all parties involved, and avoid making assumptions or judgements based on bias or preconceived notions.

The focal point will present the investigation findings to the board of Directors, which will reach a conclusion regarding the validity of the abuse complaint and any corroborating evidence and prepare a comprehensive report summarizing the investigation findings, conclusions, and recommendations for corrective action or follow-up.

The Executive Director communicates the findings and the outcomes to relevant stakeholders, including the complainant, alleged perpetrator(s), management, and any other affected parties.

They will take appropriate action to address the findings, in the form of disciplinary measures, training initiatives, policy revisions, or organizational changes.

15. Disciplinary Actions

Any acts of abuse or exploitation by eLiberare employees and associates constitute acts of gross misconduct and are, therefore, grounds for termination of employment or contract/ agreement. Breaches of safeguarding standards are grounds for disciplinary action up to and including dismissal.

Depending on the severity of the misconduct, disciplinary action may include verbal warnings, written reprimands, suspension, demotion, or termination of employment or membership, depending on the severity of the safeguarding violation and the National Labour Law.

After assessing the severity of the misconduct, the next step is to communicate with the individual involved. This involves a private meeting to discuss the findings of the investigation, to provide an opportunity for the individual to share their perspective, and explain the consequences of their actions. Less severe cases, as first time insults, or derogatory comments will not result in





immediate dismissal, but will be approached immediately with a discussion in which the person can reflect on the gravity of the situation and its consequences, after which they can draw an improvement plan with their team manager.

In taking the decision for the disciplinary action an external HR company will be consulted.

This procedure is approved by:

Loredana Urzică - Mirea, Executive Director,
on behalf of the Board of Directors

Andreea Spătaru, Focal Point,
on behalf of the Safeguarding team





Annex 1

Safeguarding Code of Conduct

1. Introduction

In keeping with its mission and values, eLiberare is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel. To help increase understanding, this Code of Conduct details eLiberare's expectations in key areas.

2. Scope and purpose

This Code of Conduct applies to the Board, Management team, all staff, volunteers and other associated personnel, alongside all partners, contractors and suppliers.

The purpose of this Code of Conduct is to set out the conduct expected of eLiberare personnel whilst under contract to the organization, and forms part of all contracts of employment. The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

eLiberare staff are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

3. Commitment to Safeguarding

eLiberare has zero tolerance for any form of abuse and exploitation. Eliberare reserves the right to refuse employment offer to staff, volunteers/ interns, if they are deemed to pose a risk to any segment of the population that the organization is engaged with.

Similarly, if any consultants/ resource person, visitors, implementing partners, contractors, suppliers and any other individuals working for or representing eLiberare are found to be engaged, or suspected of being engaged in any activity that can harm or put on risk of abuse or exploitation will be reported to the relevant authorities or their employer, and stop partnering with.

eLiberare has a 'zero tolerance' stance towards fraud, bribery and corruption. Employees/ subcontracted personnel or any associated partners must immediately report any suspected or actual instances of fraud, bribery or corruption.

No employees/ subcontracted personnel or any associated partner is allowed to claim, promise or offer gifts, commissions or other benefits in order to obtain any kind of benefit.





4. Mission and principles

eLiberare Association has for over 10 years made the safety of the beneficiaries of its programmes as well as the safety of the employees of its programmes of utmost importance in the way it has conducted its anti-trafficking work. We offer specialized services to victims of crimes, especially victims of human trafficking, as well as prevention info sessions to communities, and training to a variety of professional categories.

eLiberare sees the fight against physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices as one of its primary tasks closely connected to its core values of empathy, integrity, respect, and excellence. eLiberare also knows that if it guards the safety of its people and the communities it serves, its anti-trafficking work will be more effective.

eLiberare has articulated this commitment to safeguarding at the level of its mission, values, and code of conduct, which are promoting a culture of inclusivity, empathy, and cultural sensitivity.

Any discriminatory, disrespectful or demeaning behavior, language, or actions toward vulnerable individuals are strictly prohibited.

5. Code of conduct standards

As eLiberare personnel I will:

Uphold the integrity and reputation of eLiberare by ensuring that my professional and personal conduct is consistent with eLiberare`s mission and values

- I will create and maintain a safe and equitable organizational culture that prevents and opposes physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.
- I will treat all people fairly with respect, dignity and non-discrimination and challenge attitudes and behaviors that contravene the eLiberare Safeguarding Policy and Code of Conduct.
- I will listen to children, young adults and vulnerable groups I am working with and respect their ideas, opinions, values, and choices.
- I will welcome the individuals we are working with in different programs and encourage their participation in activities.
- I will be observant of all local laws and respectful towards local culture & customs
- I will seek to ensure that my conduct does not bring eLiberare into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed
- I will not work under the influence of alcohol or illegal drugs





- I will not keep weapons, ammunition, illegal drugs or other dangerous objects & materials on eLiberare premises or accommodation (including vehicles)
- I will immediately report any concerns I have regarding possible violations of the eLiberare Safeguarding Policy and Code of Conduct, whether by an eLiberare employee or by a related personnel or partner. I understand that failure to report any concerns may lead to disciplinary action. I will ensure that I am aware of the options available to me to report and that when I report a concern I will do so confidentially.

Not engage in abusive or exploitative conduct

- I will not sexually abuse or exploit anyone
- I will not behave physically or say anything to an individual in a manner which is inappropriate or sexually provocative.
- I will not hit or otherwise physically assault or abuse anyone. I will refrain from physical punishment or discipline of children (excluding my own children), or any vulnerable groups.
- I will not emotionally abuse anyone
- I will not belittle, insult, shout at, or otherwise verbally abuse anyone, and not use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- I will not engage in sexual activity with children (persons under the age of 18) or vulnerable adults. Mistaken belief in the age of a child is not a defense.
- I will not subject a child to physical, emotional or psychological abuse, or neglect, trafficking of human beings or child marriage.
- I will not subject an at risk adult to physical, emotional or psychological abuse, or neglect
- I will not exchange money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes any exchange of assistance or service that is due to beneficiaries, any exchange of service or support that is due to other staff and job applicants and any exchange for the services of the persons involved in sex with exploited persons, and/or persons giving sex services.
- I will not do things of a personal nature that an individual can do for themselves, such as assistance with toileting or changing clothes. If a person's disability means they need my assistance, or a child needs my assistance, I will inform a colleague in advance and ensure that I am as transparent as possible in my behavior.
- I will not engage in sex-tourism or exploit my position of relative power and prosperity vis a vis the local community to have multiple casual partners.
- I will not engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking.
- I will be visible when working with children, young adults and vulnerable groups, as far as possible. I will always make sure I have another adult present when working with children.
- I will not meet alone with a beneficiary, unless it is an extraordinary circumstance.





- I will not be alone with a child in a room with the door closed. If absolutely necessary, for providing counseling, I must seek permission from the parent or guardian and notify my superior first.
- I will not hire children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation.
- I will not develop personal relationships with beneficiaries, for my own needs.
- I will not have purely personal contact with beneficiaries outside of work.
- I will not invite children, or any other beneficiary into my home, nor go to theirs.
- I will not give or receive gifts from beneficiaries or partners, or show favoritism.
- I agree that no form of harassment shall be condoned in the workplace and that all parties will work together in recognizing and dealing with such problems, should they arise. I will not have intentional, unsolicited conduct, such as words, gestures, or actions that tend to annoy, hinder, alarm, and or abuse another person or group of persons.
- I will support the rights of all people to work in an environment free from bullying, that means any conduct that includes, but is not limited to name calling, humiliation, spreading rumors, gossiping, public ridicule, scapegoating and blaming, taunting, ostracizing, sexualizing, making racial or ethnic slurs, treating people like they are invisible, rude interruptions, sarcastic jokes, invading one's personal territory, giving limited information, then blaming, cyber bullying (bullying through email, internet, text messaging, internet websites, etc.), removing areas of responsibility without cause, constantly changing work guidelines, establishing impossible deadlines that will set up an individual to fail, assigning unreasonable duties or workload which are unfavorable to one person (in a way that creates unnecessary pressure), underwork – creating a feeling of uselessness, criticizing a person persistently or consistently, belittling a person's opinions, unwarranted or undeserved discipline, blocking applications for training, leaves or promotions, tampering with a person's personal belongings or work equipment.
- I will not discriminate illegally against beneficiaries or between employees because of age, birth, ancestry, color, creed, disability, marital status, social origin, race, nationality, religion, sex, sexual orientation, language, property, veteran status, or any other status.

Protect the safety, security, health and welfare of myself and my colleagues

- I will adhere to eLiberare's values and principles and organizational health and safety requirements in effect at my location of work.
- I will comply with any organizational security guidelines and procedures
- I will behave in a manner such as to avoid any unnecessary risk to safety, health and welfare of myself and others, including beneficiaries and local communities.

Be responsible for the use of information, assets and resources to which I have access by reason of my employment with eLiberare





- I will ensure that I use eLiberare assets and resources entrusted to me in a responsible manner and I will account for all money and property provided
- I will not use eLiberare IT equipment, software or email and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offense. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism.
- I will not use eLiberare IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse.
- I will let colleagues, partners and beneficiaries share their own contact information as much as possible, rather than sharing on their behalf. If otherwise, I will always seek and wait for permission from them before sharing any contact information with a third party.
- I will not communicate with a beneficiary under 18 years old on email, phone or any social media platform without the parent's permission.
- I will not use my personal social media accounts to communicate with any beneficiary
- I will not show photos of victims assisted with services, nor will I make public any personal data of theirs.
- I will always portray any individuals I am working with in a respectful and appropriate manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive. Babies and children must wear pants or similar. Girls beyond toddler should be wearing a top.
- When I am conducting training sessions, I will post group photos, making sure no one's face is easy to recognize.
- I will always ask for consent before taking photos of people and/or using them. When asking for consent to use the image, details should be given as to how and where this image will be used.
- I will not post or share any personal and physical information to identify the location of beneficiaries, that could put them at risk. All recorded identifying details are to be stored confidentially.
- I will avoid degrading, victimizing or shaming language and images, making inaccurate generalizations, discrimination of any kind, taking pictures out of context (try to provide informative caption)
- I will always ensure that for work-related purposes when I photograph or film a beneficiary, I will:
 - Comply with local traditions or restrictions for reproducing personal images
 - Obtain informed consent from the parent or guardian of the child, before photographing or filming a child, explaining how the photographs will be used
 - Ensure photographs, and videos present beneficiaries in a dignified and respectful manner and not in a vulnerable or submissive manner
 - Ensure beneficiaries are adequately clothed and not in poses that could be seen as sexually suggestive
 - Ensure images are honest representations of the context and the facts





- Ensure file labels do not reveal identifying information about a beneficiary, name and exact location

Perform my duties and conduct my private life in a manner that avoids conflicts of interest

- I will declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of eLiberare
- I will not be involved in awarding benefits, contracts for good or services, employment or promotion within eLiberare, to any person with whom I have a financial, personal, family (or close intimate relationship) interests.
- I will seek permission before agreeing to undertake any other form of work (public or private) that may conflict with eLiberare`s mission and values
- I will not accept significant gifts or any remuneration from the organizations we work with, my colleagues or job applicants, suppliers or contractors, government officials, donors or any other persons which have been offered to me as a result of my employment with eLiberare.

Uphold Confidentiality

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so.
- I will share sensitive information I may be aware of that relates to concerns of physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices, whether involving staff, program participants or others in the communities where eLiberare works, through the reporting options available to me. I understand that for respect, dignity and safety of everyone involved, it is essential that I maintain confidentiality about any concerns or information I am aware of and only share information with staff of the appropriate function who need to know such information. I am aware that breach of this policy may put others at risk and will therefore result in disciplinary procedures.
- I will keep the secret of the information I handle on eLiberare. The secrecy of the information concerning, but not limited to, the endowments, the internal policy, salary, but especially the information destined to a small circle of people (for example: case management information, financial situation, etc.)
- Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times.





Respect Data protection Contract clause:

The parties are aware that the European rules of Regulation 679/2016 apply to any data controller or processor located in the European Union and to any person processing personal data of data subjects located in the European Union or providing services to them. The Parties therefore confirm full compliance with the following provisions, including but not limited to:

- the ability to respect the rights of data subjects to erasure, correction or transfer of personal information
- informing all relevant recipients in the event of a data breach within a maximum of 72 hours and, in the case of the Provider, no later than 24 hours after such data breach has come to its attention,
- fulfillment of all mandatory duties regarding documentation of compliance with Regulation 679/2016.

The Employer may use the personal data of the employee/subcontracted partner or any associated partner within the limits of the contract they have concluded, this being the legal basis for processing; any further processing or processing for other purposes shall be subject to a separate data processing agreement concluded between the Parties. The storage period of personal data processed under the contract is also limited to the period corresponding to the main purpose of the contract.

Personal data exchanged between the Parties may not become accessible or communicated to unauthorized third parties or made available for use in any other way. Therefore, the Parties will take all necessary technical and in particular organizational measures with regard to the obligations assumed by this clause:

- prevent unauthorized persons from gaining access to the data processing systems with which personal data are processed or used
- prevent unauthorized use of data processing systems
- ensure that persons entitled to use a data processing system have access only to the data to which they have a right of access and that personal data may not be read, copied, modified or deleted without authorisation during processing or use and after storage
- ensure that personal data cannot be read, copied, modified or deleted without authorisation during electronic transmission or transport and that it is possible to verify and establish to which bodies the personal data are intended to be transferred by means of data transmission
- ensure that they can verify and establish whether and by whom personal data have been input, modified or deleted in/by the data processing systems
- ensure that, in the event of processing of personal data, the data are processed strictly in accordance with this contract concluded between the Parties
- ensure that personal data are protected from accidental destruction or loss
- ensure that data collected for different purposes can be processed separately





6. Review and revision

This is not a complete list. The basic understanding is that staff shall avoid actions or behavior which may constitute bad practices or potentially abusive behavior, and shall use their common sense in considering what may be acceptable and unacceptable behavior.

The Safeguarding policy and the Code of Conduct will be reviewed annually by the eLiberare Safeguarding team, or when there are changes in applicable legislation and/or regulatory guidance, afterwards being approved and endorsed by the eLiberare Board of Directors. This document will also be reviewed by the eLiberare Safeguarding team after any safeguarding incident is reported and investigated.

In reviewing, a risk assessment will be conducted. The safeguarding team will also seek input and feedback from stakeholders, including vulnerable individuals, employees, volunteers, and partners in the review process to ensure that the code of conduct remains relevant, effective, and responsive to the needs of all stakeholders.

7. Training and Support

eLiberare will make safeguarding an important element of the education and training of its staff. It will do that both in the induction of all employees and in the training of professionals for specific functions.

- Every new hire will receive a brief introduction to the vision, mission and values of eLiberare the Code of Conduct (CoC) and the Safeguarding Policy and duly acknowledge all of these as part of their induction, and signing the CoC. They will also be enrolled in taking a Trauma Course. The team manager is in charge of the induction process, and the safeguarding focal point will overview the process.
- eLiberare safeguarding team is committed to ensuring that aspects of safeguarding that are relevant to specific work processes are always part of the professional training of all staff and that, when needed, this training will be repeated.
- eLiberare Board of Directors will continue to make sure that the professionals who handle the cases and complaints have competencies in line with the highest standards and best practices.
- eLiberare safeguarding team will regularly across the programmes and projects organize campaigns to create awareness about safeguarding. The campaigns will be precisely targeted and tailored to ensure that they are relevant to the staff and participants in question. They will have a very varied character.

8. Monitoring and compliance

Managers, Supervisors and human resource officers must ensure that all eLiberare employees and related personnel understand and comply with eLiberare`s safeguarding policy and sign the Code of Conduct. They are responsible for robust safe recruitment and induction, and ensuring staff have a thorough awareness and sensitization to this policy and the issues it raises.





Managers will ensure performance management of staff supports an accountable and safe organisational culture to prevent physical abuse, emotional abuse/ psychological violence, sexual abuse/ violence, sexual harassment, child and adolescent abuse, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation, online abuse, forced labour, sex trafficking, online sexual abuse, and harmful practices.

9. Complaints and reports

All complaints or concerns related to breaches of the Code of Conduct should be reported to: asistenta@eliberare.com.

However, staff may raise the issue with their team manager who will be able to report on their behalf. If they feel more comfortable, they can report via an online form available on the website, or a physical form available in all our fixed and mobile work points

Reports of misconduct, unethical behavior, or wrongdoing within the organization are protected by SG11_Whistleblowing Policy and will be processed promptly and confidentially according to the Safeguarding Procedure. They can be sent directly to the chairwoman of the organization, at ioana@eliberare.com.

eLiberare has zero tolerance for fraud, corruption, financial misconduct, or other unethical practices.

eLiberare is committed to integrity, ethical conduct, and accountability, and will make complainants and whistleblowers feel protected and appreciated. We strictly prohibit retaliation or victimization against whistleblowers for making reports in good faith, and therefore they will not be subjected to harassment, discrimination, disciplinary action, termination of employment, or other forms of retaliation as a result of their whistleblowing activities.

Whistleblowers and any other complainants will be offered support and assistance as needed throughout the investigation process, including access to counseling, legal advice, advocacy, and protection from reprisals.

The emergency number for calling the police: 112

eLiberare Crisis Text Line: +40757749845

I have read and understood the present Code of Conduct and I undertake to discharge my duties and to regulate my conduct in accordance with its requirements.

Sign here: _____

Name: _____

Position: _____





Today's Date: _____

Annex 2

Agreement for the processing of personal data

Signed today, _____, by:

a. Asociația eLiberare, hereinafter referred to as the Association, tax code 31440532, Accreditation Decision No.5223/ 07.12.2021, by the Ministry of Labour and Social Justice, represented by LOREDANA URZICĂ-MIREA, acting as Executive Director, as a provider of social services,

and

b. _____, residing in _____, str. _____, nr. _____, bl. _____, sc _____, fl.j _____, apartament _____, county/sector _____, I.D. sr _____, nr. _____, issued by _____, on _____, with CNP _____, as a beneficiary.

Given:

1. The Association's status as a Personal Data Operator, meaning that it processes personal data belonging to private individuals;
2. The relevant legal provisions on the protection of personal data contained in, but not limited to: Law No 677/2001 on the processing of personal data and the free movement of such data, Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, EU Data Protection Directive 95/46/EC ("Data Protection Legislation")
3. The provisions of eLiberare Association's Privacy Policy, available on the organization's website.

The parties have decided to sign this agreement on the conditions applicable to the processing of personal data carried out for the purpose of providing the specialized services of the Support Centre for Victims of Crime.

Protection of the beneficiary's personal data

Art. 1. The beneficiary expressly and unequivocally agrees and consents to the processing of his/her personal data by the association, as personal data operator, for the following purposes: rendering social services, fulfilling the organization's legal obligations, pursuing the organization's legitimate interests.

a. The beneficiary gives his/her explicit, free, specific and informed consent to the collection and processing of his/her personal data to the extent that it is/becomes necessary for the provision of





social services necessary to support the beneficiary as follows: name, surname, date of birth, gender, age, marital status, address (home/residence), e-mail address, telephone and fax number, personal numerical code, series and number of identity card/passport, social or health insurance number, contact details in case of emergency, information on professional development, data on duties performed and performance evaluation, economic situation, images/photographs, voice audio recordings, video recordings, other personal data brought to the attention of the association by the beneficiary.

b. The beneficiary explicitly, freely, specifically and knowingly consents to the association making and retaining copies of identity documents or any documents containing data of the beneficiary provided by the beneficiary.

c. The beneficiary gives his/her explicit, free, specific and informed consent to the collection, storage and processing by the association of his/her sensitive personal data relating to health, biometric data, nationality, religious denomination.

Art. 2. The Beneficiary acknowledges and consents that the Association may disclose and transfer his/her personal data to the Association's service providers, state authorities, and/or other public institutions or third parties in accordance with Social Protection Legislation and/or Data Protection Legislation.

Art. 3. The Association will process the beneficiary's personal data throughout the period of providing social services under the contract and even after this period, if there is a legal obligation for the beneficiary to do so (e.g. internal reporting, archiving, etc.).

Art. 4. The Beneficiary declares and guarantees that at the date of signing this Agreement he/she has been duly informed by the Association about all aspects of the processing of personal data, including:

- a. the purpose(s) for which the personal data are processed;
- b. the identity of the operator respectively the association;
- c. the recipients or categories of recipients of the personal data;
- d. whether the provision of personal data is mandatory and the consequences of refusing to provide them;
- e. the existence of rights under the applicable legislation on personal data.

This Agreement has been drawn up in two copies, one copy for each party, and shall be effective from the date of signature.

Association,

Beneficiary

Represented by:

Name and surname:

Loredana Urzică-Mirea

Signature:





Annex 3

Confidentiality Agreement

Signed today, _____, by:

a) Asociația eLiberare, hereinafter referred to as the Association, tax code 31440532, Accreditation Decision No.5223/ 07.12.2021, by the Ministry of Labour and Social Justice, represented by LOREDANA URZICĂ-MIREA, acting as Executive Director, as a provider of social services

and

b) _____, identified by CNP _____, as a beneficiary.

I declare that I understand that I will not disclose personal details shared as part of the services I offer/access (as applicable) through the Victims of Crime Support Centre and undertake to comply with the following:

- confidentiality of eLiberare Associations data;
- confidentiality regarding the location of the Centre for the Support of Victims of Crime;
- confidentiality of personal details used by the beneficiary/representatives of the eLiberare Association;
- confidentiality of information discussed during counseling sessions and other meetings for the purpose of providing/receiving social services.

Limitations of the agreement:

The beneficiary hereby acknowledges that he/she understands that in circumstances of imminent or possible bodily harm or crime, the Association employees are required by law to take steps to prevent any such situation.

Association,

Represented by:

Loredana Urzică-Mirea

Signature:

Beneficiary

Name and surname:

Signature:





Annex 4

Standard Reporting Form

(To be filled in by complainant/ Safeguarding Focal Point)

Your Details

Name: _____
Employer's Name: _____
Designation: _____
Capacity in which child/ vulnerable adults is know yo you: _____

About the Child/ vulnerable adult

Name: _____
Age/ DOB: _____
Gender: _____
Address: _____
In case of child (whom does the child live with (e.g. household structure/ caretaker)

Any other information:

Details of Concern/ Suspicion/ Incident:

How did you come to know about the incidence? KEEP FACTUAL.
(Details of what happened, including time, dates, names of others involved, behavior of physical sings observed, details of possible perpetrator: Note: Please do continue on a separate sheet if required)

Details of any conversation with the child or adult or other informat:
(Write down exactly what the child/ vulnerable adult said and what you said (or another informant said). Remember, do not lead a child/ vulnerable adult – record actual details. Please do continue on a separate sheet of paper if necessary)





Have you contacted anyone already about this concern: (e.g. Family member, Parents, Caretaker, Line Manager, Co-worker, Safeguarding Focal Person or agencies etc.). If YES then please provide a detail such as: time, date of reporting and person to whom report was made.

Advice given by that person (If any):

Any action you may have taken so far:

Undertaking:

I can confirm that to the best of my knowledge the information provided above is correct, and that I will be available to answer any further question on this matter.

Signed:

Date:





Annex 5

Safeguarding Investigation Reporting Form

Private and Confidential

1) Referral details: (Details of person reporting concern)

Name: _____

Address: _____

Contact: _____

Occupation: _____

Nature and extent of contact with Child or vulnerable adult:

Time: _____

Date: _____

Place: _____

2) Details of Child or Vulnerable Adult:

Name: _____

Age: _____

Date of birth? _____

Gender: _____

Religion: _____

Address: _____

Household structure: _____

(If child) School name: _____

Class: _____

Class teacher: _____

Any disability: _____

3) Alleged perpetrator's details:

Name: _____

Age: _____

Gender: _____

Address: _____

Relationship to vulnerable child or adult: _____

Occupation: _____

Any other information: _____





- 4) **Details of concern(s), allegations(s) or incident(s) dates, times, who was present, description of 24 any observed injuries, parent's view, view of vulnerable adult of child's view if known: (including vulnerable individual's words if possible)**

- 5) **What action has been taken internally to support the vulnerable children or adults and to minimize the risk of recurrence of such incidence? e.g. current safety of the individual child, internal action of organization..**

- 6) **Interview with the alleged perpetrator - findings and statements**





7) Interview with witnesses - findings and statements

8) Any other source of evidences and investigation - findings





9) Which external agencies or institutions (if any) have been informed? What action has been taken by them?

10) Other observations

Reported by:

1. _____ **Signature** _____

2. _____ **Signature** _____

Date of reporting: _____

Reviewed by Andreea Spătaru, Focal Point, _____ **Date:** _____





Annex 6

Safeguarding Risk Assessment Template

- **Assessment Date:**
- **Completed By:**
- **Review Date:**

Purpose

This risk assessment template helps identify, evaluate, and mitigate potential safeguarding risks to beneficiaries, staff, volunteers, and other stakeholders involved in our programs and activities.

Risk Assessment Matrix

Risk Rating Guidelines

Likelihood:

- High (3): Likely to occur frequently
- Medium (2): Could occur occasionally
- Low (1): Unlikely to occur

Impact:

- High (3): Severe consequences for individuals/organization
- Medium (2): Moderate impact that requires significant response
- Low (1): Minor impact that can be easily addressed

Overall Risk Level = Likelihood × Impact

- High Risk: 6-9
- Medium Risk: 3-5
- Low Risk: 1-2

Risk Assessment Table

Risk Category	Specific Risk	Likelihood (1-3)	Impact (1-3)	Risk Level	Existing Controls	Additional Actions Required	Person Responsible	Timeline
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Program
Activities





Staff/Volunteers

Beneficiaries

Partners

Digital/ Online

Common Risk Categories to Consider

1. Program Activities

- One-to-one work with vulnerable individuals
- Transportation of beneficiaries
- Overnight activities/residential programs
- Activities in remote/isolated locations
- Photography and media collection
- Distribution of goods/services

2. Staff/Volunteers

- Recruitment and screening processes
- Training and supervision
- Staff behavior and conduct
- Power imbalances
- Access to sensitive information
- Remote working arrangements

3. Beneficiaries

- Vulnerable groups (children, elderly, disabled)
- Cultural and language barriers
- Access to complaint mechanisms
- Privacy and data protection
- Emergency situations
- Gender-based risks

4. Partners

- Partner vetting procedures
- Alignment of safeguarding standards
- Joint activities and programs
- Information sharing
- Subcontractor management
- Community engagement





5. Digital/Online

- Online communications
- Data storage and protection
- Social media usage
- Virtual programs/activities
- Digital security
- Online harassment

Mitigation Strategies

For each identified risk, consider:

1. Prevention measures
2. Detection mechanisms
3. Response procedures
4. Recovery plans

Review and Monitoring

- Schedule for regular review:
- Process for updating assessment:
- Method for tracking implementation:
- Stakeholder consultation plan

Assessed by:

Position:

Date:

Reviewed by:

Position:

Date:

Approved by:

Position:

Date:

Notes and Comments

[Add any additional observations, concerns, or context-specific considerations]

