

<p>World Vision Romania Child and Adult Safeguarding Policy</p>	
<p>Approved by: Mihaela Loredana Nabăr – Executive Director Approved Date: December 16, 2022</p>	<p>Signature: </p>

1. OVERVIEW

1.1 Introduction

1.1.1. Safeguarding children and adults living in communities we serve is foundational to all WVR activities, programmes, and Lines of Ministry (relief, development, and advocacy). Central to everything we do is our commitment to *do no harm* to any child anywhere nor to adults living where World Vision Romania has a programming presence. We uphold the best interests¹ of children as a primary consideration in all actions and decisions.

1.1.2. Safeguarding includes preventing, reporting, and responding to harm or abuse caused by WVR employees and affiliates of children and of adults living where WVR programming practice.

1.1.3. WVR is committed to continuous improvement of safeguarding efforts which emphasises prevention of sexual exploitation and abuse (PSEA) and other forms of violence or harm. We abhor any misuse of power, status, or trusted position for any sexual or other exploitative purposes. We endeavour to tackle this root cause of abuse in our prevention and training efforts.

1.1.4. WVR has zero tolerance towards incidents of violence or abuse against children or adults, including sexual exploitation or abuse, committed either by employees or others affiliated with our work. WVR takes necessary actions to respond to any suspected or known instances of abuse. Incident responses are centred on the child or adult survivor, prioritising their interests.

1.1.5. This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where WVR has a programming presence.

1.2 Scope

1.2.1 This Policy applies to all WVR programmes and projects, and must be abided by all its affiliated, expatriate, national and contract employees, covering all employment categories including without limitation consultants, independent contractors, seconded, part-time and temporary employees, interns, and volunteers to address Safeguarding risks relating to their engagement with WVR's work, as well as Board and Advisory Council. References herein to "WVR" shall be understood as including all of these entities, unless the specific language or context clearly indicates otherwise.

1.2.2 This Policy is focussed on protecting all children anywhere from harm caused by WVR employees and affiliates and protecting adults from harm caused by WVR employees or affiliates as part of WVR programme presence.

1.2.3 This Policy applies equally in emergency relief and development aid programmes, as well as advocacy and fundraising activities.

1.2.4 All specific Safeguarding requirements will be implemented by WVR based on the current available Guidelines for Implementation of the World Vision Child and Adult Safeguarding Standards.

1.3 Effective Date

¹ Convention on the Rights of the Child, General Comment 14: http://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

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This contextualised WVR Policy took effect on 16 December 2022, being revised based on the Partnership Management Policy updated and effective as of 15 September 2021.

1.4 Retired/Related Policies

This contextualized WVR Policy on Child and Adult Safeguarding expands upon the previous version in place since 22 February 2019, to align with the last updated global Partnership Management Policy..

This policy complies with WVR Code of Conduct.

1.5 Contextualisation

WVR is responsible for ensuring the implementation and periodic review of the contextualised Safeguarding Policy, which is to be consistent with the standards outlined in the Partnership Management Policy on Child and Adult Safeguarding and in accordance with local laws.

The national Safeguarding Policy may have more strict requirements, as required by national law or context.

2 POLICY

The Child and Adult Safeguarding Policy outlines standards and procedures in the following ten key areas:

1. Safeguarding Policies and Responsibilities
2. Behavior Protocols
3. Recruitment
4. Visits to WVR projects at all locations/ territories where WVR has operations
5. Communications, Social Media and Digital Technology
6. Safeguarding Incidents and Response Protocols
7. Programming consideration for Safeguarding
8. Local Marketing activities
9. Safe child participation
10. Board and Advisory Council Safeguarding Governance

2.1 Safeguarding Policies and Responsibilities

2.1.1 Development of Contextualised Safeguarding Policies:

The Office must contextualise the Policy and update it on the regular schedule of Policy review, per section 1.5 above. WV Romania is responsible for ensuring the development, implementation and periodic review of the contextualized Safeguarding Policy, in close coordination with WVR's relevant departments and consistent with the global standards.

2.1.2 Relevant WVR Employees, Interns, Volunteers, Board/Advisory Councils and other affiliated people:

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WVR equips all employees, interns, volunteers, and Board/Advisory Council members to understand and perform their safeguarding responsibilities and obligations. WVR also applies appropriate standards to external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with WVR’s work. Hereafter, the full range of people for whom all or some parts of this Policy are relevant (either directly or through contractual arrangements) will be referred to as ‘WVR employees and/or affiliates’.

2.1.3 Signed Acknowledgement:

All WVR employees, volunteers, interns, and Board/Advisory Council members need to sign an acknowledgement that they know, understand and will follow this Policy and the People and Culture department should keep the acknowledgement in their personal records. Individual employees or subcontractors of Contractors and Partners as defined below also need to acknowledge the Safeguarding Policy, and one copy of these signatures is held by the Contractor or Partner, while another is to be kept by the relevant WVR department.

2.1.4 Agreements with Contractors:

Contractors who are engaged in situations where they or their employees or sub-contractors may have access to children or adults living in areas where WVR has a programming presence, or may have access to personal data of children or adults who are living in areas where WVR has a programming presence, require the safeguarding language below (or language substantively the same) in their contract with WVR.

In addition to the signing of acknowledgement of WVR’s Child and Adult Safeguarding Policy and procurement vendor registration screening with self-sworn statement, all contractors, especially those that have access to children or adults living in areas where WVR has a programming presence, or their data, should sign the Safeguarding Behavior Protocols as part of their contract. Also, contractors who are engaging in communications, advocacy or marketing activities should sign WVR’s Prevention of Harm in Communications part of the Policy. These requirements apply whether the Contractor is being paid for the services or is providing them for free (‘pro bono’), and is irrespective of the duration of the contract.

”In the course of performing this contract, Contractor and Contractor’s employees will ensure that:

1. Any of their interactions with adults living where WVR has a programming presence, with children, or with identifiable personal data about such persons, will comply with the attached WVR Safeguarding Behaviour Protocols, and with any other reasonable safeguarding measures that WVR may specify;
2. Any incidents of harm or risk of harm to any child or to adults living where WVR has a programming presence will be reported immediately to WVR;
3. Any individuals with access to adult programme participants, to children, or to identifiable personal data about such persons, will have a current clean criminal background check for offenses against children or abuse of adults, to the extent

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permitted by law (evidence of which will be provided to WVR upon request) or alternatives to police background checks if an Exemption is approved².

4. They do not use children for labour; and
5. These safeguarding obligations will be clearly communicated to, and acknowledged by, all employees who may have access to children or to adults living where WVR has a programming presence, or to identifiable personal data about such persons, and will be extended in identical form to any subcontractors (if any are authorised) engaged to perform this contract.”

Other service providers screening

Before contracting with hotels or venue service providers for WVR, through the Program Managers/Project Coordinators, Administration, Support Services and/or Supply Chain team should follow up on the adherence of the service provider to the safeguarding of children and adults.

2.1.5 Agreements with Partner Organisations:

When engaging a partner for a WVR programme or programme activity, World Vision Romania must assess the capability of the Partner to fulfil safeguarding responsibilities, including the Partner’s safeguarding policy, procedures, and implementation. World Vision Romania must then either (a) approve or (b) develop a capacity building plan and support the Partner to develop stronger safeguarding controls.

a) The agreement (whether referred to as an ‘agreement’, ‘subgrant’, ‘Memorandum Of Understanding’, or any other term) must specify that before the Partner begins any work on the project, World Vision Romania will conduct this assessment and approve or support the Partner as appropriate.

b) The Partner can agree to follow WVR’s local Safeguarding Policy in carrying out the programme activities. If the agreement is established to follow WVR’s Child and Adult Safeguarding Policy, the Partner should receive orientation and acknowledge receipt of WVR’s Child and Adult Safeguarding Policy.

c) The agreement must ensure that any of the Partner’s personnel working in the WVR project will have clear criminal record/police background check for offenses against children or abuse of adults, to the extent permitted by law, prior to employment or engagement with WVR (evidence of which will be provided to WVR upon request).

2.1.6 Training

All WVR employees, volunteers, interns, and Board/Advisory Council members, as well as contractor or Partner employees or partner volunteers working within a WVR project, receive safeguarding training within 90 days from the start of employment or WVR affiliation.

² According to the Romanian legislation, in case of contractors, WVR has approved from the WVI a letter of exemption for the police background checks and applies alternative measures to prevent harm to vulnerable children and adults and to ensure due diligence.

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WVR employees and volunteers receive periodic refresher courses or other safeguarding training courses at least once every two years thereafter. Board/Advisory Council members receive refresher training on their re-election (see Section 2.10).

The responsibility for organizing these trainings belongs to the WVR Safeguarding Specialist, who should provide regular guidance and refresher trainings on the contextualized policy of child and adult protection at the beginning of the WVR employment or affiliation (volunteers, interns and Board/Advisory Council members as well as employees of the partners or their volunteers - working within a WVR project), followed by regular refreshes trainings organized at least once every two years, in collaboration with the People and Culture department.

Additionally, WVR Safeguarding Specialist should provide capacity building to departments which have specific safeguarding responsibilities such as; People and Culture (e.g. new staff orientation), Security, Procurement, Programs, Communications, Accountability, feedback and compliant mechanism and child protection (e.g., safeguarding incident response for children). This additional capacity building can be supported by online safeguarding training materials that are available in the WV Central safeguarding site under: Safeguarding Training Materials and e-Campus.

2.1.7 Safeguarding Staffing:

WVR has Safeguarding Focal Point/Safeguarding Specialist who will provide leadership to the implementation of this Policy.

Humanitarian/Emergency responses which are declared a Category 3 response appoint their own Safeguarding Focal Point/Specialist.

The Lead/Focal Point has a mandate for direct access to the National Director/CEO (or Regional Leader/SDO, or Disaster Response senior manager), and to the WVI Safeguarding Director, should he/she feel that safeguarding issues are not being addressed adequately.

2.2 Behaviour Protocols

2.2.1 Safeguarding Behaviour Protocols:

WVR employees and affiliates behave in ways that safeguard all children everywhere and adults living where WVR has a programming presence, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people WVR serves or works amongst.

2.2.2 WVR employees and affiliates should abide by the below listed behavior protocols and rules when engaging with children anywhere and adults living where World Vision Romania has a programming to prevent sexual exploitation and abuse, and prevent any other intentional and unintentional harm to the people that WVR serves or works for. This rules of behaviour are based on

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local and culturally appropriate interactions with children, members of the opposite sex, and other adults living in the programming area, and are included in each contextualised Safeguarding Policy.

- Any WVR affiliates that are not required to sign the full Child and Adult Safeguarding Policy must at minimum acknowledge in writing the receipt and understanding of the Child and Adult Safeguarding Behavior Protocols.
- WVR Managers at all levels have a particular responsibility to support and develop systems that maintain an environment that prevents sexual exploitation and abuse of children and adults, and promotes the implementation of the Child and Adult Safeguarding Policy and ensure their team members receive Child and Adult Safeguarding trainings.

Anyone who fails to follow the WVR Safeguarding Behavior Protocols as stated below will be subject to corrective actions up to and including termination.

Acceptable Behaviour – WVR employees and affiliates:

- a. create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of these Behaviour Protocols;
- b. are careful about perception and appearance in their language, actions and relationships with children and with adults living where WVR has a programming presence. Their behaviour— including in person and on digital platforms, both online and offline—demonstrates a respect for children and adults and their rights;
- c. ensure that all physical and online contact with children and programme participants is appropriate in the local culture;
- d. use positive, non-violent methods to manage children’s behaviour;
- e. accept responsibility for personal behaviour and actions as a representative of the organisation;
- f. are always accountable for their response to a child’s behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with children;
- g. where possible and practical, follow the ‘two-adult’ rule while conducting WVR work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times;
- h. comply with safeguarding-related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- i. comply with applicable data privacy laws and with relevant WVR data privacy and information security policies, including WVR digital child safeguarding protocols, when handling any personal data about individual children or adult programme participants, and that such data must be maintained and transferred in a secure, confidential manner;

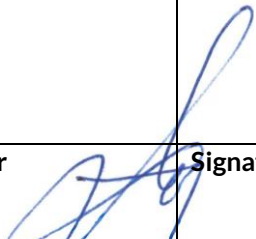
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- j. immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a WVR employee or affiliate, or a humanitarian aid worker³ from any other agency (See Section 2.6.5 on how to report.).

Unacceptable Behaviour – WVR employees and affiliates do not:

- a. behave in an inappropriate physical manner or develop a sexual relationship with a child (under 18 years old), regardless of the country specific legal age of consent or age of majority. This includes consenting or condoning the above behaviour (including fostering or condoning child marriage, i.e. under 18 years old). This also includes behaviour that could be seen as grooming a child for a future inappropriate relationship;
- b. develop or seek a sexual relationship with any adult living where WVR has a programming presence. Such relationships, based on inherently unequal power dynamics, undermine the credibility and integrity of WVR’s humanitarian aid or development work;
- c. sexually exploit or abuse any adult living where World Vision Romania has a programming presence or any child;
- d. exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands. This includes exchange of assistance that is already due to programme participants;
- e. communicate with a child in WVR's programme areas via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, WhatsApp, Skype), or online without consent and knowledge of his/her parents. Further, WVR employees or affiliates never communicate on mobile, digital or online platforms with children or adult programme participants in ways that are inappropriate or sexual;
- f. fondle, hold, kiss, hug or touch any child, or any adult living where WVR has a programming presence in an inappropriate or culturally-insensitive way;
- g. use inappropriate or abusive language with a child nor an adult living where WVR has a programming presence, for example language that causes shame or humiliation, or is belittling or degrading;
- h. spend excessive or unnecessary time alone with a child or adult programme participant, away from others or behind closed doors or in a secluded area;
- i. condone or participate in behaviour which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse;
- j. Hire children in any form of child labor (including as “house help”) unless it is within the best interest of the child and in alignment with Romania Law of employment (above 16 years) and international standards (Child labor is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. However, the Romanian legislation "may authorize the employment in light work of persons between 13 and 15 years of age or the execution by these persons of such work provided that the

³ “Humanitarian aid worker” includes all paid employees, volunteers, contractors, and other affiliates of organisations providing emergency relief or development aid. Such organisations include UN agencies, INGOs, LNGOs, and CBOs.

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respective works are not liable to harm their health or development or are not such as to prejudice their interest in school, participation in vocational guidance or training programs approved by the competent authority, the opportunity to benefit from the training received"⁴. (See ILO Convention 182 and 138 for further explanation of child labor.)

- k. hit or use other corporal punishment against a child while the child is in WVR care or the WVR employee or affiliate is conducting WVR work;
- l. take a child alone in a vehicle for WVR work, unless it is absolutely necessary, and with parental/guardian and managerial consent;
- m. misuse or be careless with personal data about individual children or adult programme participants;
- n. stay silent, cover up, or enable any known or suspected safeguarding incident or breach of Safeguarding Policy by a WVR employee or affiliate;
- o. exchange inclusion in WVR programmes or benefits for any kind of favour from a member of the community, as this is an abuse of power.

The above list provides concrete examples but is not exhaustive of all behaviours that constitute a violation of this Policy.

2.2.3. Disciplinary Action

The following are grounds for discipline, up to and including termination of the employment or other affiliation with WVR:

- Failure to follow WVR Safeguarding Behaviour Protocols;
- Failure to follow any other part of the WVR Safeguarding Policy;
- Other inappropriate behaviour toward any children or any adults living where WVR has a programming presence;
 - Failing to report a known or suspected safeguarding incident committed by a WVR employee or affiliate; or
 - Interference with any investigation or inquiry into a possible policy violation.

Individuals who have been found to have breached this Policy may have “**Do Not Rehire**” placed on their personnel file. Partners and Contractors may have “**Do Not Re-engage**” placed on their file based on the nature of the case.

2.3. Recruitment

2.3.1 Screening

⁴ Article 7 of Convention 138/26 June 1973 of the International Labour Organization (ILO)
<https://legislatie.just.ro/Public/DetaliuDocumentAfis/22381>

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WVR takes diligent measures to screen out all people who might seek to use WVR to harm children or adult programme participants, or whose past actions indicate an unacceptable risk of such harm.

- These measures include but are not limited to addressing safeguarding in job advertisements (when feasible), applications, interviews and references. Safeguarding screening measures are applied to all candidates for employment, Board/Advisory Council members, volunteers, interns and individual contractors who will have access to children or adult programme participants or to their identifiable personal data.

- During the interview process, applicants are asked about previous work with children.
- For references supplied by applicants, questions are asked regarding the suitability of the candidate to work with vulnerable adults and children or for a child-focused agency. Documentation of references is kept on file.

- Screening of internal candidates includes reference checks and review of their personnel file for any previous infractions while working with WVR.

Note that major grant donors may have specific screening requirements for work they fund, so relevant grant terms and regulations should be checked.

2.3.2. Identity and Criminal Background Checks

Candidates for employment, Board/Advisory Council members, volunteers, and interns—as well as relevant personnel of contractors and partners—have an identification check and an appropriate criminal record/police background check, to the extent permitted by law, prior to employment or engagement with WVR, and periodically thereafter as required by law or appropriate for the context.

Formal Global Centre exemption approval is required for alternatives to police background checks in contexts where they are not feasible or trustworthy or lawful. People with a prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by WVR, to the extent permitted by applicable law, and in any case will not be placed in a position with access to children or adult programme participants, or to their personal data.

2.4. Visits to WVR Projects

2.4.1. Visitors

Visitors subject to this Policy include people going to a WVR field programme or meeting children at a WVR-facilitated event.

- “Visitors” include sponsors, donors, other delegations such as celebrity supporters or journalists invited by WVR.

- Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance, but are accompanied by a WVR employee(s).

- Unannounced visits to sponsored children or WVR project communities are not permitted.

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2.4.2. Visit Preparation

Visits by all sponsors and private donors, and other international visitors are pre-approved by both the sending and the hosting office. The office sending the visitor conducts a police background check on potential sponsor or donor visitors prior to any field visit, where permitted by law. As WVR now has specific projects where local donors/sponsors support Romanian children, specific measures will be taken if some of these people wish to visit the children, or if visits are organised for children to some donor organisations/institutions. Such visits will always be carefully facilitated and accompanied by WVR staff and organized outside of the children’s community to protect their privacy and keep the children’s identity will be kept safe at all times. WVR will also undertake adequate measures that any unannounced, unauthorized or unaccompanied contacts between the donors/sponsors are prevented.

2.4.3. Visitor Orientation to Safeguarding

WVR is diligent to ensure that visitors uphold the relevant sections of this Policy. The following requirements apply to visitors who visit a project or have direct contact with community members in WVR programming areas.

- Visitors from other WV/WVI offices who are employees or Board Members: The hosting office provides a brief orientation to any distinctive Safeguarding Behaviour Protocols that apply in that context, as well as local customs regarding adult interaction with children. Employees and Board members do not need to re-sign the policy or behaviour protocols.
- Visitors who are not WVR employees or Board Members: All such visitors are briefed on WVR’s **Safeguarding Behaviour Protocols** (Section 2.2.1) and **Prevention of Harm in Communications** (Section 2.5.3) by the sending office prior to the visit. Upon arrival, visitors receive a brief written or oral orientation and sign acknowledgement of receipt of the protocols. The signed acknowledgement is kept on file by the hosting entity. Non-employee or Board visitors are accompanied by a WVR employee when visiting projects.

2.4.4. Monitoring visits in a European project

The monitoring visits are official meetings (announced or unannounced) in order to monitor the implementation/sustainability of the projects that take place at the beneficiary/partners' premises or at the project implementation site, in which representatives of the beneficiary/partners and representatives of the local government/relevant institutions need to participate. Also, according to the beneficiary manual⁵, special (ad hoc) visits can be organized by the represent of the funding office during the activities with the beneficiaries. The WVR staff participation, or even prior announcement to WVR, is not planned, as these are actually WVR performance monitoring visits.

According to WVR ' Safeguarding policy, if the funding office will be visiting the community, then the following requirements will be apply:

⁵ <http://mfe.gov.ro/pocu/4-2-rapoarte-de-monitorizare/>

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- The visitors must be accompanied by a WVR employee during their visit (with a short notice that is to be organised by WVR); and
- Sign acknowledgement of WVR’s Safeguarding Behaviour Protocols and Prevention of Harm in Communications

If the visit will be unannounced, they may sign these documents well in advance of visit, which is to be communicated to the donor/s by WVR leadership or the respective Safeguarding Focal Point. As a measure of due diligence and protection to the communities that they and we are serving, the visitor/s must agree to adhere to World Vision Behaviour Protocols. If there are donors who are not willing to adhere, and the visit will be organized unannounced, there will be a level 2 Safeguarding incident posted on the WV Integrated Incident Management System (IIM). The local government/relevant institutions/beneficiaries will be advised to report such visits to WVR.

2.5. Communications, Content, and Marketing

2.5.1. Dignity

WVR takes care to ensure cultural sensitivity and restrictions for reproducing personal images are adhered to before photographing or filming a subject, and WVR ensures images are honest representations of the context and the facts. In all forms of communication, children and adults are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.

2.5.2. Consent

Children and adults who are primary subjects of text, photo, video, audio and/or data gathered on behalf of WVR must provide informed consent, and have the right to withdraw their consent at any time for any reason. World Vision Romania must be able to demonstrate that informed consent has been given, and have systems in place that allow WVR to show that a request to withdraw consent has been respected.

Informed consent means the subject has a general understanding of the purpose of the content, and gives verbal or written permission thereof. If the primary subject is a child, informed consent is also collected from the parent, guardian, or other legally required entity or individual.

In the following situations, verbal consent is not acceptable and written consent is collected adult or the child’s legal guardian:

- a. the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or
- b. where otherwise required by applicable law

2.5.3. Prevention of Harm in Communications:

WVR is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children and adults. WVR takes the following steps to prevent harm through

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communications, content gathering and marketing (including digital or offline photographs/videos/audio clips, stories, articles, or any other communication materials):

- Personal information on children and adults that is captured, stored or sent through electronic, on-line or mobile devices is password protected. In addition, data is handled in accordance with WVR’s current information security standards for personal data, which may include encryption and other requirements.
- WVR ensures that relevant requirements for safeguarding are clearly communicated to all staff, sponsors, vendors and partners at the point of access to photographs, videos or data, and that appropriate measure are taken for child-safe usage of the content once it has been shared.
- Recognising the special vulnerability of children, material posted on social media or digital channels mentions only the child’s first name and country name, and does not contain a child’s family name, or child’s personal location/address. In cases of sensitive subjects such as unaccompanied children or child sex workers among others, WVR conceals the child’s identity in images and uses a pseudonym.
- Material with a child or children is not geo-tagged to precise locations if it contains any part of the child’s name. An acceptable alternative is to retag photos with the child’s first name only to programme or project office location.
- WVR discourages direct, unfacilitated, undocumented communication through social media without WVR’s knowledge between: a sponsor/donor/visitor and beneficiary/participating children and between employees/volunteers/other WVR affiliates and beneficiary/participating children.
- Where WVR facilitates communication between children and external parties, controls are put in place to protect children’s safety and well-being.
- WVR provides reporting and response options so that sponsors, donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened. WVR donor/visitor welcome kits, websites, domains and social media platform profile pages contain reporting options for child protection concerns or safeguarding incidents.
- Use of platforms to share marketing or communications content with no ability to track back evidence of informed consent and/or platforms that lack the ability to withdraw consent is forbidden. Only platforms that have been vetted by global or local WV IT are permitted for sharing content between offices or with donors/external parties. (e.g. Horizon, RMT, StoryHub, etc.)

2.5.4 Reporting Communications, Social Media and Digital Technology Policy Violations

All violations of this Policy should be reported to the WVR Safeguarding Specialist. Responses are based on the magnitude of risk and its severity to children or adults living where WVR has a programming presence.

The investigation may result in legal action and:

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- a. discipline up to and including possible termination of employment for staff or volunteers or of engagement of contractor;
- b. Possible termination of formal working relationship with partners.

2.6. Safeguarding Incidents and Response Protocols

2.6.1. Responding to Safeguarding Incidents:

WVR is required to investigate and respond to reports of violations of this Policy and harm of children adult programme participants in ways which are consistent with local law. WVR **uses three levels of Child and Adult Safeguarding Incidents** to determine WVR’s response, which is based on the seriousness of the incident and WVR’s role. Offices with community-based programmes develop a Safeguarding Incident Preparedness Plan (SIPP) which defines response in line with local law and available services.

- Harm, injury or death caused by natural causes, accidents or natural disasters in communities are not considered child or adult safeguarding incident, unless they fit one of the points listed in the definition below.
- During incident responses and reporting ensure that the child and adults (living where World Vision Romania has a programming presence) are safe and verify the provision of protection, psychosocial and medical care, legal support as well as involvement of community leaders, police and family.
- Minimize any further risks to the potentially affected child and vulnerable adults, staff security and media and partner/community relation.

Level 1	<p>Abuse of or harm to a child, in a community where WVR has program operations and that is not committed by WVR employees or affiliates (serious harm that threatens the child victim’s survival, safety or development). These shall be reported within 48 hours of first notice.</p>
Level 2	<p>Any violation of the policy which puts any child anywhere or adults living where WVR has a programming presence in <u>direct risk of potential harm</u>, but where no actual harm is believed to have occurred. Report incidents to WVR Safeguarding within 24 hours of first notice.</p>
Level 3	<p>Allegation or accusation of harm or abuse to a child or adult living where WVR has a programming presence by a WVR employee or affiliate. This can also include death or injury of a child participating in or at a WVR activity or caused directly by a WVR related person, and/or a road traffic accident involving a WVR vehicle or driver affiliated with WVR in which a child is injured or killed. Report actual or alleged incidents to WVR Safeguarding immediately and NO will report to WVI Safeguarding within 24 hours of first notice.</p>

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2.6.2 Level 1 Child Protection Community Incidents:

Abuse of or harm to a child, in a community where WVR has programme operations and that is not committed by WVR employees or affiliates, is a Level 1 Incident.

- a. The Level 1 Incident with cases of serious physical or psychological harm, injuries or death of any child from abuse, neglect, exploitation or other forms of violence that threaten the child victim's survival, safety or development shall be reported to the WVR Safeguarding Focal point within **48 hours** with all information available. The most common Level 1 incidents and the adequate referral/response protocols are defined in the WVR SIPP.
- b. Field offices track and document Level 1 Incidents in an Excel spreadsheet, with all information available from the incidents' opening to closure. Level 1 cases do not need to be reported through the WV Integrated Incidents Management (IIM system) any longer, but do need to be shared with the RO/GC when required.
- c. DO NOT report to local authorities without consulting with WVR Safeguarding Specialist.
- d. To prevent similar incidents in the future, while sharing the Level 1 incident information and analysis with local government, community leaders and law enforcement, DO NOT compromise the confidentiality of survivors/victims or perpetrator information.
- e. WVR Safeguarding Specialist in Coordination with relevant department/staff should close the incident after all relevant actions are taken to address the situation and the process should be documented in secure and confidential manner.

2.6.3 Level 2 Safeguarding Incidents:

- a. Level 2 Incidents are **any violation of the WVR Child and Adult Safeguarding policy** which put child anywhere or adults living where WVR has a programming presence in direct risk of potential harm, but where no actual harm is believed to have occurred.
- b. The violation includes behavior protocols, visitors, recruitment or screening procedure, missing child or adults living where WVR has a programming presence, information and inappropriate or hazardous involvement of children in WVR project activities.
- c. WVR Safeguarding Specialist should ensure the safety of affected children and adults (living where World Vision Romania has a programming presence) and follow the Safeguarding Incident and response Protocols using survivor centered approach.
- d. Complete the Child and Adult Safeguarding Incident Report through online Integrated Incidents Management system with all information available **within 24 hours of first notice**.
- e. The response is implemented by WVR with oversight by and accountability to the WVI Safeguarding Director and support from Middle East and Eastern Europe (MEER) Safeguarding

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Lead. All action progresses should be updated on Ethics Point or through e-mail in case of limited access to Ethics Point.

- f. After all the necessary actions have been completed, WVR Safeguarding Specialist should close the cases within 90 days. If the incident could not be closed within 90 days, Regional and Global Safeguarding Lead should be notified.

2.6.4 Level 3 Safeguarding Incidents:

A Level 3 Incident is an allegation or accusation of harm or abuse to any child anywhere or adults living where WVR has a programming presence **by a WV employee or affiliate**.

If a child is involved, two additional types of incidents qualify:

- Death or injury of a child while participating in or at a WVR activity or caused directly by a WVR employee or affiliated person, and/or;
 - A road traffic accident involving a WVR Vehicle or driver affiliated with WVR in which a child is injured or killed.
- a. WVR or employee or affiliate must report actual or alleged Level 3 Incidents to WVR Safeguarding Specialist **within 24 hours of first notice or Report it directly through Ethic Point.**
 - b. Response is implemented by WVR with oversight by and accountability to the WVI Safeguarding Director and support from the MEER Safeguarding Focal Point. Where mandated by applicable law, grant requirements, or agreements with WVI, relevant Support Offices are informed immediately in coordination with WVI Legal. See section 2.6.6 Notification of Safeguarding Incidents.

The response will focus to:

- Mitigate further harm to any child or adult survivors by the alleged perpetrator(s);
- Ensure primary consideration of the best interests of all affected children or adults, particularly any survivors of violence;
- Take appropriate disciplinary action against WVR employees or affiliates according to the WVR People and culture policy and applicable law;
- Assist survivors and support any legal procedures against the alleged perpetrator(s);
- WVR through the guidance of WVI will conduct an internal investigation, with special attention to the rights of children and adult survivors, and of the accused;
- The Safeguarding Incident Preparedness Plan should outline a referral plan to help survivors access to services including service providers and budget consideration.

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- WVR Safeguarding Specialist should *collaborate with Security department to prepare for and minimize any risks to the organization* associated with the incident, with particular interest to staff security, public relations and continuity of operations.

2.6.5. Reporting incidents:

All WVR employees and affiliates are responsible and obligated to report any suspicion of Level 2 or Level 3 incidents as soon as it is discovered. As stated in section 2.2.3(d), failure to report by one of the mechanisms below is breach of this Policy and is grounds for disciplinary action up to and including termination of employment. In addition, any credible concern or suspicion of sexual abuse or exploitation by a humanitarian worker outside WVR is immediately reported. Where interagency mechanisms are established, these are utilised to report the incident, in consultation with the WVR Safeguarding Lead/Focal Point for the Field Office or Disaster Management Response.

WVR has a **Community Feedback and Accountability Mechanism** that requires that all projects establish safe access and effective ways for community members, especially children and women, to report abuses by WVR employees or people affiliated with WVR.

Reports can be made by WVR employees or affiliates in the following ways:

- Report to line manager or P&C manager
- Contact WVR Safeguarding Focal Point (who then reports on IIM system)
- Contact Regional Safeguarding focal point (who then reports on IIM system)
- Contact WVI Safeguarding Unit by email at safeguarding@wvi.org
- Staff can use Incident Reporting form in WV's Integrated Incident Management (IIM) system: www.worldvisionincidentreport.ethicspoint.com
- If the above options are not available or appropriate for whatever reason: Use WV Integrity and Protection Hotline (also known as Whistleblower Hotline): Phone numbers and online reporting options available at <http://worldvision.ethicspoint.com>.

2.6.6. Notification of Safeguarding Incidents:

The WVI Safeguarding Unit informs the donors of safeguarding incidents according to contractual obligations and regulatory requirements. Additionally, the donors may be notified if an incident has potential reputational issues.

- The WVI Safeguarding Unit can provide a copy to WVR for the purpose of notifying local donor offices if appropriate.
- In line with the principle of “need to know”, no identifying information on survivors, witnesses or subjects of complaint are shared in these notifications.

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- c. Only basic information is provided in order to
 - ensure the privacy and safety of those involved in the incident and
 - provide assurances that World Vision Romania is appropriately managing the case.
- d. Donors are notified according to contractual/regulatory requirements using the information provided by the WVI Safeguarding Unit's notification.

2.6.7. Disclosure:

Whilst WVR maintains appropriate confidentiality for individuals in Safeguarding Incidents, it may disclose information or data about incidents, when lawfully permitted, in order to support prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, enable appropriate due diligence, advocate to prevent future incidents, or as required by law.

- a. Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by the national office or regional office or WVI Safeguarding Unit. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorised parties, such information is not collected.
- b. Detailed personal information, in particular health information, is not obtained or maintained by WVR in safeguarding incident management, except for the minimum necessary to ensure WVR handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and informational security standards.

2.6.8. Reporting to Authorities:

WVR evaluate reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). World Vision Romania reports when legally authorised to do so, unless a report is judged likely to cause greater harm to existing victims or potential future victims.

If an employee or a WVR affiliate suspects or has become aware of a situation of abuse, neglect, ill-treatment or of an act provided for by the criminal law, of trafficking and exploitation of vulnerable persons or against sexual freedom and integrity (including sexual abuse), committed against a minor, he/she is obliged under the Romanian legislation to urgently notify the incident to the competent authorities.⁶

2.6.9. No Retaliation for Reporting:

⁶ Romanian Criminal Code (art. 266) and Law 272/2005 on the protection of children's rights{ Art. 88(3), art. 91 (6) }

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World Vision Romania does not tolerate any harassment, retaliation or adverse action whatsoever by any employee, director, contractor or other affiliate as a result of any safeguarding report provided in good faith to World Vision, law enforcement or other recognised reporting mechanism.

- a. No employee shall be adversely affected because they refuse to carry out a directive that could reasonably be construed as likely to create abuse or neglect of a child or an adult programme participant.
- b. If an employee believes that they are being retaliated against, the employee should immediately contact People and Culture or report it through the Whistleblower hotline. Anyone who retaliates against an employee for making a good faith report will be subject to disciplinary action up to and including termination. WVR’s commitment to anti-retaliation does not prevent a reporter from appropriate disciplinary action if they are found to have engaged in unethical behaviour or misconduct.

2.6.10. Safeguarding Investigations:

Safeguarding investigations meet minimum standards and follow the core principles of investigating allegations of harm, exploitation or abuse to child &/or adult living where World Vision Romania has a programming presence: thoroughness, confidentiality, safety, competent investigators, impartiality, objectivity, timeliness, accuracy and documentation.

- a. Investigations follow a survivor-centred approach and investigators conduct the process in accordance to sector best practice to prevent further harm to the survivor. World Vision Romania prioritises the safety, physical and psychological health and welfare of all survivors while upholding and promoting their rights of confidentiality, equality and access to justice.
- b. World Vision Romania may deploy internally trained investigators or retain the services of an external investigator to manage an incident. Oversight of investigations takes place according to the protocols of the incident level.

2.7. Programming Considerations for Safeguarding

2.7.1. Safeguarding Essentials in Programming:

In all programmes (including development, humanitarian response and advocacy), WVR seeks to **DO NO HARM** to children or adult programme participants, to keep the interests of community members—especially children—at the centre of our activities, and to utilise opportunities to help children be safer within their families and communities. This includes :

- consideration of local child protection threats and issues during the entire program life cycle
- influencing local actors and groups to be safer organisations for children and adult programme participants.

2.7.2. Community Feedback and Complaints Mechanisms and Information Provision:

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Children, parents, and other adults are aware of established complaint mechanisms in WVR projects and their right to be safe from abuse and exploitation in WVR programmes. As part of our wider Programme Accountability Framework, every community-level WVR programme:

- a. ensures that there are community feedback and complaints mechanisms through which community members can report both general suggestions and any serious incidents of misconduct by WVR employees or affiliates. These mechanisms should be safe and contextually appropriate (i.e. designed in consultation with the community and so child-friendly, gender-sensitive and inclusive of those with low levels of literacy).
- b. provides information to communities on what behaviour they can expect of WVR employees or affiliates and how to report any concerns about abuse, exploitation, or any other breaches of Behaviour Protocols by WVR employees or affiliates.

2.7.3. Online safety in programme activities:

WVR actively supports beneficiary/participating children and their parents/caregivers—as well as any children participating in WVR-organised digital activities—to understand how to safely and appropriately utilise social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.

2.7.4. Institutionalisation and Adoption:

As a Christian organisation, World Vision Romania values the family as the primary social unit and basis of civil society. Children grow and thrive best in a family-based environment, not in institutional care.

- a. WVR therefore does not support programming within long-term institutions in ways that perpetuate the institutionalisation of children. World Vision Romania supports community-based care options for children which allow the child to remain with family members. If remaining with the family is not in the best interests of the child, WVR supports the family, community and local authorities to find community-based solutions. WVR does not facilitate the adoption of children.
- b. Short-term or interim care is sometimes needed for girls and boys to ensure their protection whilst longer-term community care is arranged. For example, short-term care may be appropriate for girls and boys who have been seriously abused or trafficked, have been associated with fighting forces, in conflict with the law, or living on the streets. World Vision Romania only supports interim care facilities that are family-like in their design. An interim care facility is not always needed: safe community care options are preferred if they are available.
- c. World Vision Romania responds to risks and situations of children deprived of parental care by strengthening families to care for children, reducing risk of separation from their immediate and extended family, strengthening systems that provide alternative community-based options to institutionalisation, and supporting transition and deinstitutionalisation processes.

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2.7.5 Humanitarian Responses:

Because of the special vulnerability of children and adults during humanitarian responses, safeguarding measures take on additional importance. Category 3 Responses must meet the standards outlined in this Policy in addition to other industry standards.

- a. Humanitarian protection and child protection are anticipated and planned for in programme designs, ensuring that World Vision Romania does not expose programme participants to greater harm through participation.
- b. All Category 3 Responses must complete a safeguarding self-assessment.
- c. All Category 3 Responses must have an assigned Safeguarding Focal Point who has direct access to response management and who has responsibilities as expressed in section 2.1.7 of this Policy.
- d. Some aspects of this Policy may be addressed through accepted industry mechanisms, such as the cluster system or PSEA network.

2.8. Local Marketing activities

2.8.1. Prevention of Harm in LM child-focused activities:

Because of the close relationship built between World Vision Romania employees and affiliates with children and their families through Local Marketing activities, unique safeguarding considerations must be put in place to reduce risk of abuse and exploitation. All activities engaging children are implemented in a manner that keeps their safety as the top priority. This includes:

- a. The facilitation and review of all sponsor correspondence and all other types of connection, such as photos or videos, between the sponsor and child to ensure appropriate interaction and safety of all parties;
- b. Training of staff and affiliates who facilitate some activities on behalf of WVR to recognise and respond to abuse and any other types of incidents and also to be Informed about Child and Adult Safeguarding Policy
- c. Constructive and respectful interaction with parents and children
- d. The secure handling and storage of personal information
- e. Gathering only the minimum elements of personal information necessary for the programme/project.

As stated in 2.7.3 above, WVR actively supports any children and their parents/caregivers participating in WVR-organised digital activities—to understand how to safely and appropriately utilise social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.

2.8.2. Child Protection Minimum Standards:

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All programmes and projects ensure the following minimum package of Child Protection Minimum Requirements (interventions) are included in their programming:

- a. Conducting a child protection context analysis to understand and address the community child protection issues and their root causes
- b. Supporting or strengthening community-based reporting and referral mechanisms that enable boys and girls, caregivers, and other community members to report child protection violations with confidence and receive help in addressing them
- c. All adolescents (aged 12 to 18) are directly participating in interventions that strengthen their well-being. Interventions that strengthen life skills and protective skills are prioritised and used to the extent that it is feasible

2.8.3. Responding to Abuse:

Programme/project staff and/or affiliates involved in activities with children promote appropriate follow-up action or referrals if child safeguarding needs are observed or reported, as stipulated in the national Safeguarding Incident Preparedness Plans and consistent with local law.

2.9. Safe Child Participation

Child participation is when children under 18 years of age contribute to decisions and take actions on issues that affect their lives through empowering children and nurturing positive relation between children, adults and communities based on mutual respect and partnership.

2.9.1 Prevention of Harm in Child Participation:

WVR works to empower children as citizens and participants in their own well-being, and to minimise any risk of harm or negative consequence resulting from participation in activities promoted by WVR.

Child participation programmes and activities are based on context analysis with clearly identified needs and expected results, along with how the project will measure progress towards achievement while mitigating risks through risk assessments.

2.9.2 Ethics:

Child participation activities are designed and implemented to adhere to principles and ethics which keep the best interests of children as the top priority.

2.9.3 Informed Consent in Child Participation:

Child participation activities are voluntary and inclusive (especially of the most vulnerable children), and both children and parents/caregivers make informed decisions regarding participation, including due consideration of the benefits and risks that could be associated with the activity. Consent forms must be kept _____ on _____ file.

2.9.4 Child Travel:

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When it is in the best interests of children, WVR sometimes helps children travel to domestic or international events, activities or other opportunities.

- a. In such cases the child and the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel.
- b. The child’s health, safety, well-being, and meaningful participation are the most important priorities during travel supported by WVR.

2.10. Board and Advisory Council Safeguarding Governance

2.10.1.Accountability:

National Boards and Advisory Councils hold World Vision Romania offices accountable to fulfilling their safeguarding responsibilities as outlined in the Board-level Partnership Policy for Child and Adult Safeguarding as well as the Partnership Management Policy for Child and Adult Safeguarding.

2.10.2 Risk appetite:

Boards and Advisory Councils ensure that local risk appetite statements for Child and Adult Safeguarding set the risk area/category as Risk Averse.

2.10.3. Committee oversight:

The Board/AC mandates one of its committees to provide oversight (or in the case of an Advisory Council committee, advice) to safeguarding. Given the heightened level of importance of safeguarding oversight, the full Board/AC receives periodic reports and is informed as well as engaged on safeguarding issues.

2.10.4.National Office reports provided to the full Board/AC:

WVR provides a copy of the Annual Safeguarding Update Report to the Board/AC. The Office also provides the associated Safeguarding Action Plan outlining how they will maintain and improve safeguarding controls as outlined in the Annual Safeguarding Update Report.

2.10.5.Training of Board/Advisory Council members:

At inception, the entire Board/Advisory Council are given training by the local Safeguarding Focal Point or by the RO/WVI Safeguarding Unit where it is not practical for the local Safeguarding Focal Point to do so.

- a. Every new member to the Board/Advisory Council are given this training at orientation, and sign an acknowledgement of having reviewed the contextualised Policy on Child and Adult Safeguarding. This acknowledgement is kept on file by WVR P&C department.
- b. Board/Advisory Council members re-elected to serve another term repeat the training they received at orientation to refresh their knowledge.

3.DEFINITIONS

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Child: Any person below the age of 18. This contextualised Policy on Child and Adult Safeguarding covers interactions by WVR employees and affiliates with all children anywhere (not only programme participants).

Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation and all other forms of violence against children. A World Vision global sector, together with child participation.

“Community with whom World Vision Romania works” or “living in a World Vision Romania Programming Area”: World Vision uses a broad working definition of these terms to ensure that any individuals who may be subject to power imbalance with World Vision Romania staff, affiliates, or programming are protected through this Policy.

Contractor: WVR regularly contracts with non-employee individuals and organisations to perform services for WVR. These non-employee individuals and organisations may also be referred to as ‘independent contractors’, ‘consultants,’ or ‘vendors’, and are referred to in this document as ‘Contractors’. Contractors are distinguished from organisations with which WVR partners to carry out programme activity (including subgrantees). See Partner, below.

Partner: A partner organisation, for safeguarding purposes, is a Non-Governmental Organisation, Community-Based Organisation, for-profit enterprise, or other entity that has a written agreement with WVR to implement a programme or activity on WVR’s behalf or in collaboration with WVR. The partner may or may not receive funding from WVR.

Safeguarding: Preventing, reporting, and responding to harm or abuse by WVR employees and affiliates, of any children anywhere and of any adults living where WVR has a programming presence. Externally to WVR, there is often no distinction made between child and adult safeguarding.

Child safeguarding: Preventing, reporting, and responding to harm⁷, abuse or exploitation of any child (< age 18) by a WVR employee or affiliate⁸. The Policy on Child and Adult Safeguarding also requires reporting/referring child abuse cases affecting any child in WVR programmes, even if not committed by WVR employees or affiliates.

Adult safeguarding: Preventing, reporting, and responding to harm, abuse or exploitation of an adult living where WVR has a programming presence (age 18+) by a WVR employee or affiliate⁹. Includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding.

⁷ Includes injury or death of a child while participating in a WVR activity or when involved in a road traffic accident with a WVR driver or WVR vehicle.

⁸ Includes WVR employees, volunteers, interns, Board members, visitors, contractors, or partners—as well as employees or sub-contractors of partners and contractors.

⁹ Ibid.

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Safeguarding incident: Harm or risk of harm resulting from safeguarding misconduct or violations of this Policy to any child or to any adult living where WVR has a programming presence,

Sexual Exploitation and Abuse (SEA): The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.¹⁰

Prevention of Sexual Exploitation and Abuse (PSEA): A term used by the United Nations and International Non-Governmental Organisation community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by humanitarian aid workers.

Volunteer: A person who is neither employed by WVR nor legally obliged to work for WVR, but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to WVR’s work. ‘Volunteer’ includes a ‘business volunteer’ in a WVR office or affiliate; a ‘supporter volunteer’ without physical contact with sponsored children or their records; ‘community volunteer’ who volunteers on behalf of their community to fulfil the community’s responsibilities in an ongoing WVR project; and volunteers or ‘incentive workers’ from groups or communities targeted for humanitarian assistance. All categories of volunteers are subject to the contextualised Policy on Safeguarding, except community volunteers for whom the following apply:

1. The community volunteer does not have physical contact with sponsored children or their records as part of their volunteer activities; AND
2. Beyond basic training, WVR does not specify how to complete the relevant activities; AND
3. The community does not perceive or consider this person as ‘part of WVR’s work’ due to their volunteer activities, and if they were to harm a child or adult, would not be expected to hold WV responsible.

WV employees and affiliates: Refers to the full range of people accountable to WVR’s Safeguarding policies and protocols, including all employees, interns, volunteers, and Board/Advisory Council members, as well as external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors.

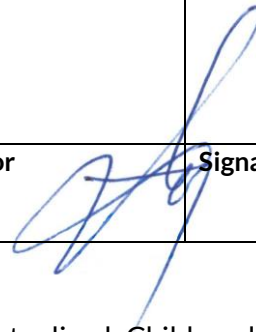
4.BACKGROUND

This Partnership Management Policy is authorised by the Partnership Policy on Children’s Well Being and Partnership Policy on Code of Conduct. This Policy is grounded in WV’s broader ministry mandates—particularly Child Protection, which builds community capacity and strengthens local and national systems that protect children.

¹⁰ UN Secretary-General’s Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)

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This Policy replaces and subsumes the WVR contextualised Child and Adult Safeguarding Policy approved on 22 February 2019..

This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where WVR has a programming presence.