

NAPOCA POROLISSUM LOCAL ACTION GROUP ASSOCIATION

CHILD PROTECTION POLICY (CPP)

Contents

Purpose of the policy	3
Scope	3
Reference framework	3
Working definitions	4
Guiding principles.....	4
Context and risks specific to the Napoca Porolissum Local Action Group Association	5
Standard 1 – Policy	5
Institutional commitment.....	5
Policy objectives.....	6
Integrating child protection into the project cycle.....	6
Standard 2 – People.....	6
Institutional responsibilities	6
Safer recruitment and selection	7
Training and awareness.....	8
Code of conduct - mandatory rules.....	8
Standard 3 – Procedures.....	9
Risk assessment before activities	9
Agreements, consent and participation	9
Supervision and organization rules.....	10
Photography, video, communication and data	10
Online activities	10
Travel, visits and transport.....	10
Reporting and response procedure	11
Managing allegations against LAG staff or partners	11
Standard 4 – Accountability.....	11
Records and confidentiality	11
Monitoring and learning	12
Accountability to children and the community.....	12
Provisions for partners and service providers	12
Non-compliance with the policy	12
Final clause	12

Purpose of the policy

The Child Protection Policy sets out the commitment of **the LAG Napoca Porolissum** to prevent, identify, report and respond appropriately to any risk of abuse, neglect, exploitation, violence, psychological harm, violation of dignity, or improper use of children's data and images, whenever children are directly or indirectly involved in, or affected by, the organization's activities.

The policy aims to provide a practical and proportionate framework for an organization that is not a provider of social services for children, but that may work with minors through one-off or recurring projects and actions.

Scope

This policy applies to all persons who represent or act on behalf of the LAG Napoca Porolissum:

- ✚ team members, employees and collaborators;
- ✚ members of the Board of Directors and governance structures;
- ✚ volunteers, mentors, experts, facilitators, trainers, moderators and consultants;
- ✚ interns, pupils or students undertaking practical placements;
- ✚ service providers and suppliers who come into contact with children during LAG activities;
- ✚ project partners, subcontractors and co-implementing organizations, to the extent provided for contractually.

The policy applies both to face-to-face activities and to those carried out online or in hybrid format, as well as to the preparation, selection, implementation, documentation, communication and evaluation stages.

Reference framework

This policy is aligned primarily with the following reference points:

- ✚ the **UN Convention** on the Rights of the Child;
- ✚ the **Keeping Children Safe International Standards**, structured around the four areas: Policy, People, Procedures and Accountability;

- ✚ **Law no. 272/2004** on the protection and promotion of children's rights, republished, as subsequently amended and supplemented;
- ✚ **Regulation (EU) 2016/679 (GDPR)** and the applicable rules on the processing of personal data;
- ✚ **Law no. 118/2019 on the National Automated Register** regarding persons who have committed sexual offences, offences of exploitation of persons or offences against minors;
- ✚ national rules on reporting abuse cases and public reporting mechanisms, including **119** and, in emergency situations, **112**.

Working definitions

For the purposes of this policy:

- **child** - any person under 18 years of age;
- **child protection / child safeguarding** - the set of measures through which the organization prevents and responds to the risk that a child may be harmed through its actions, omissions, programmes, staff, partners or communications;
- **abuse** - any intentional act by a person in a relationship of responsibility, trust or authority that endangers the child's life, development, integrity, or physical or mental health;
- **neglect** - the intentional or unintentional failure to provide the child's essential needs and appropriate protection;
- **safeguarding concern** - any suspicion, incident, observation, disclosure or indicator suggesting that a child is or may be at risk;
- **designated child protection person** - the person appointed by the LAG to receive reports, coordinate the internal response and ensure liaison with the competent authorities.

Guiding principles

- the best interests of the child take precedence in all decisions and actions;
- all children have an equal right to protection, without discrimination;
- the child is listened to in a manner appropriate to their age and level of understanding;
- child protection is everyone's responsibility, not that of a single person only;
- prevention is preferable to reacting afterwards;
- any reasonable suspicion is treated with seriousness, promptness and confidentiality;

- the child's data and image are protected through minimisation, necessity and respect for dignity;
- the LAG acts proportionately to the nature of its activities, without downplaying risks.

Context and risks specific to the Napoca Porolissum Local Action Group Association

Children are not usually the only target group of the LAG Napoca Porolissum; however, the organization may interact with children and adolescents in contexts such as local projects, local consultation meetings, workshops, activities in schools, competitions and community festivals, volunteering, micro-internships, exchanges of experience, study visits, fairs and public events, information campaigns, online activities and promotional materials.

In this context, the LAG recognizes in particular the following risks:

- inappropriate contact, offensive language, intimidation, favouritism or unsuitable behaviour from the adults involved;
- unsupervised one-to-one interactions between adults and children;
- insufficiently checked selection of volunteers, mentors, trainers or service providers;
- photographing, filming or sharing images and information about children without a clear basis and without adequate protection measures;
- travel, transport, field visits or activities carried out in spaces that have not been adequately assessed from a safety perspective;
- online risks: contact through personal accounts, private messages, session recording, exposure of the child's data or location;
- under-reporting of incidents due to fear, shame, confusion or lack of procedural clarity;
- heightened vulnerabilities for children from isolated rural areas, from families facing socio-economic difficulties, for girls, for Roma children, for children with disabilities, or for those in other vulnerable situations.

Standard 1 – Policy

Institutional commitment

The LAG Napoca Porolissum adopts a zero-tolerance approach to abuse, exploitation, neglect, degrading treatment, harassment, intimidation, humiliation and any other behaviour that may affect a child's safety, dignity and development.

The organization recognizes that risks may arise not only from direct contact between adults and children, but also from the way activities are designed, partners are selected, spaces are managed, travel is organized, digital tools are used, or results are communicated publicly.

Policy objectives

- to prevent risks of harm to children in all LAG activities;
- to clarify which behaviours are acceptable and which behaviours are prohibited;
- to establish clear responsibilities for staff, collaborators and partners;
- to establish clear procedures for reporting, response, documentation and learning;
- to ensure basic compliance with applicable legal and ethical standards.

Integrating child protection into the project cycle

- at the planning stage, each project or activity involving minors will be subject to a safeguarding risk assessment;
 - at the contracting stage, the LAG will include child protection clauses in relevant contracts with partners and service providers;
 - at the implementation stage, supervision, communication, consent and documentation rules will be ensured;
 - at the closing and evaluation stage, incidents and lessons learned will be reviewed to improve the policy.

Standard 2 – People

Institutional responsibilities

- the **LAG Manager** is responsible for the adoption, minimum resourcing and implementation of the policy;
- the **Board of Directors** monitors the existence of measures and is informed about significant incidents, without unnecessary disclosure of personal data;
- the designated child protection person receives reports, maintains the incident register, coordinates the internal response and, where necessary, contacts the authorities;
- each team member and each collaborator has the duty to know the policy, comply with the code of conduct and promptly report any concern.

LAG Napoca Porolissum appoints a designated child protection person responsible for receiving safeguarding concerns, coordinating the internal response, maintaining the incident register and ensuring liaison with the competent authorities, where necessary.

The designated child protection person is:

Name: Suciu Denisa

E-mail: denisa.popa.1990@gmail.com

Telephone: +40 742 648 505

- The identity and contact details of the designated child protection person shall be communicated internally to all staff, volunteers, experts and collaborators involved in activities with children. They shall also be made available to children, parents/legal representatives, partners and community members, including through the online publication of this policy.

Safer recruitment and selection

For all roles involving direct, repeated or unsupervised contact with children, the LAG applies mandatory safer recruitment and vetting measures before the person starts the activity. These measures include identity verification, review of relevant experience and suitability for the role, references where relevant, and a signed commitment to comply with the Child Protection Policy and the Code of Conduct.

For any role involving direct contact with minors, the LAG requires the applicable background checks, including checks **under Law no. 118/2019** on the National Automated Register regarding persons who have committed sexual offences, offences of exploitation of persons or offences against minors, where required or applicable under Romanian legislation.

A person cannot be assigned to a role involving direct, repeated or unsupervised contact with children until the required checks and commitments are completed. If concerns arise during recruitment or vetting, the LAG may refuse the collaboration or limit the person's involvement in activities with minors.

Training and awareness

In addition to introductory and activity-specific training, **the LAG ensures continuous child protection training and awareness-raising** for persons involved in activities with minors, at least once per year or whenever significant changes occur in legislation, procedures, risks or project activities.

- all persons covered by the policy receive introductory information at the start of the collaboration, including the main child protection principles, the Code of Conduct, reporting obligations and the role of the designated child protection person;
- persons with an active role in events, workshops, mobility activities, consultations or other activities involving minors receive practical training on professional boundaries, prevention of abuse and inappropriate behaviour, reporting procedures, confidentiality and data protection;
- the LAG ensures continuous child protection training and awareness-raising for relevant staff, volunteers, experts and collaborators at least once per year, or whenever significant changes occur in legislation, procedures, identified risks or project activities;
- the designated child protection person receives additional training or guidance on case management, documentation, referral and reporting to the competent authorities.

Code of conduct - mandatory rules

All LAG representatives must:

- treat every child with respect, calmness and appropriate language;
- avoid isolated one-to-one situations as far as possible; where they cannot be avoided, they must be justified, time-limited and visible / reportable;
- use only institutional or approved channels for communications related to activities;
- seek the necessary informed consent before photographing, filming or publishing;
- report immediately any concern, disclosure or incident.

The following are prohibited, including but not limited to:

- any form of physical, emotional, verbal, sexual or economic abuse;
- humiliating punishments, sexualised jokes, degrading remarks, intimidation or discrimination;

- unnecessary or ambiguous physical contact, or contact that may be perceived as intrusive;
- communicating with a child through personal accounts for purposes unrelated to the LAG activity;
- requesting or sharing intimate images, sensitive data or traumatic stories without adequate safeguards;
- transporting a child by a single adult without approval and without documented justification, except in exceptional situations assessed immediately;
- the consumption of alcohol or substances that impair judgment during activities involving children.

Standard 3 – Procedures

Risk assessment before activities

For any activity involving minors, the activity lead completes a short safeguarding check covering at least:

- the type of activity and the age group;
- who the adults involved are and what roles they have;
- the venue, access, supervision and emergency exits;
- the rules for transport, travel and collection of children;
- accessibility needs and specific vulnerabilities;
- how communication, photography and data processing will be handled;
- the contact points for reporting and intervention.

Agreements, consent and participation

- children's participation in activities is, as a rule, based on the information and consent of the parent / legal representative whenever the nature of the activity requires it;
- in addition to the responsible adult's agreement, the LAG also seeks the child's agreement / assent in a manner appropriate to their age;
- the child may refuse photography, filming, publication of their name or participation in an activity that exposes them, without being penalised;
- no more data are collected than are necessary for the purpose of the activity

Supervision and organization rules

- whenever possible, activities with children are carried out in the presence of at least two responsible adults or in an open and visible space;
- closed doors, isolated rooms and unsupervised meetings are avoided;
- attendance lists, emergency contacts and any relevant medical / logistical restrictions are handled confidentially;
- children are not left unsupervised at the beginning, during or at the end of activities.

Photography, video, communication and data

- images of children are used only for a legitimate, proportionate and approved purpose;
- as a rule of caution, the child's image should not be linked with their full name, address, exact school, contact details or other elements that may identify them excessively;
- contextual, back-view or group images are preferred, especially in public online communications;
- sensitive materials are stored only on authorized channels and devices;
- children's comments, testimonials or personal stories are used only with additional safeguards and without exploiting their vulnerability.

Online activities

- online sessions are held on known platforms with appropriate security settings;
- access links are not shared publicly if this may expose children;
- individual communication via private chat is avoided, except in justified and transparent operational situations;
- session recording is carried out only if necessary, known to participants and technically protected.

Travel, visits and transport

- before travel, the route, responsibilities, meeting points and emergency contacts are clarified;
- individual transport of a child by a single LAG representative is avoided;
- overnight accommodation of children together with unrelated adults is not permitted;
- any incident, delay, temporary loss of contact or change of plan is communicated immediately to the responsible persons.

Reporting and response procedure

Any person covered by this policy has the duty to report without delay any reasonable suspicion, disclosure or incident. The minimum procedure is as follows:

- ensure the child's immediate safety; do not aggressively confront the suspected person and do not put the child at risk;
- listen calmly, without promising absolute confidentiality and without asking pressing or leading questions;
- record factually what you observed or what you were told, including date, time, place and persons involved;
- inform immediately the designated child protection person and the LAG Manager;
- if there is immediate danger, call 112; for reporting cases of abuse, neglect, exploitation or other forms of violence against a child, 119 may also be used;
- the designated person decides, together with management and within the limits of the organization's competence, whether to notify the DGASPC, the police, the school or other competent authorities;
- all measures are documented and kept confidential, with restricted access.

Managing allegations against LAG staff or partners

- any allegation regarding a team member, volunteer, expert, partner or service provider is treated immediately and impartially;
- the person concerned may be temporarily removed from activities involving children during the preliminary assessment, as a protective measure and without prejudging guilt;
- the LAG cooperates with the competent authorities and avoids resolving only informally situations that may amount to abuse or a criminal offence;
- the child and the family must not be exposed to retaliation, intimidation or pressure.

Standard 4 – Accountability

Records and confidentiality

- the LAG maintains a secure internal register of safeguarding reports and incidents;
- documentation is limited to the information necessary for protection and reporting;
- access to data is restricted to persons who have a legitimate need to know this information;
- data are retained and deleted in accordance with internal archiving and data protection rules.

Monitoring and learning

- the policy is reviewed at least annually;
- contracts, consent forms, training materials and internal procedures are updated when necessary;
- compliance with the policy is checked periodically in LAG projects and events

Accountability to children and the community

- the LAG will communicate, in an accessible form, to children and responsible adults that the organization has protection rules and that concerns can be reported;
- relevant materials will indicate the contact person for concerns and the minimum reporting pathway;
- partners will be informed that child protection is a condition of collaboration in activities involving minors

Provisions for partners and service providers

Where activities involve minors, the LAG Napoca Porolissum will include, as far as possible, in contracts, partnership agreements, invitations to collaborate or terms of reference, provisions on:

- compliance with this policy or an equivalent policy;
- the obligation to report safeguarding concerns immediately;
- the obligation to ensure suitable and, where appropriate, checked staff;
- limiting the use of children's data and images strictly to the approved purpose;
- the LAG's right to suspend collaboration if serious breaches occur.

Non-compliance with the policy

Breach of this policy may lead, as appropriate, to administrative or disciplinary measures, termination of collaboration, notification of the competent authorities, or other measures provided by law and internal regulations.

Final clause

This Child Protection Policy shall be made publicly available online, in a transparent and easily accessible manner, to all persons who come into contact with the LAG Napoca Porolissum, including children, parents/legal representatives, staff, volunteers, experts, partners, service providers and community members.

This Child Protection Policy is publicly available online, in a transparent and easily accessible manner, to all persons who come into contact with the LAG Napoca Porolissum Association, including children, parents/legal representatives, staff, volunteers, experts, partners, service providers and community members.

The policy is published on the official website of GAL Napoca Porolissum:
<https://napocaporolissum.ro/>, in the CERV Programmes section.

The online version of the policy is kept up to date, and any revised version approved by the organization is published without undue delay.

This **Child Protection Policy** enters into force on the date of its approval and is binding on all persons and structures to which it applies.

Legal Representative:

Dumitrescu Marius-Gheorghe

Approval date:

23.04.2026

Signature: