

Safeguarding of Children and Vulnerable Adults Policy

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Acronyms

CP- Child Protection

CPG- Child Protection Group

CRC- [United Nations] Convention on the Rights of the Child

HR- Human resources

MoSA- Ministry of Social Affairs

PSEA- Protection from sexual Exploitation and Abuse

SFP- Safeguarding Focal Point

SOP- Standard Operating Procedures for the protection of juveniles in Lebanon

ST- Safeguarding Team

Definitions

Safeguarding: The responsibility of an organization to make sure that its staff and programs do no harm to children and vulnerable adults, that they do not expose them to the risk abuse, and exploitation; and that appropriate response is made is put in place when harm does occur.

Safeguarding is an umbrella term that covers all forms of sexual exploitation and abuse, harassment, human trafficking, where beneficiaries and/or other staff members are affected.

Child: Anyone under the age of 18, as per the UN Convention on the Rights of the Child.

Vulnerable adult / Adult at risk: Someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect.¹

Abuse: a deliberate act of ill treatment that is likely to cause harm to a person's safety, well-being, and dignity. Abuse includes different forms (physical, sexual, emotional or neglect).

- **Sexual:** unwanted sexual activity or exposure that happens without consent or understanding. The activities may involve physical contact, including assault by penetration (e.g., rape) or nonpenetrative acts such as masturbation, kissing, rubbing and touching. Sexual abuse also includes non-contact activities, such as involving the individual involuntarily in producing or looking at pornographic materials (including via the internet).
- **Physical:** Non-accidental physical injury often resulting in physical impairment. Examples include striking, kicking, burning, shaking, slipping or biting.
- **Emotional:** Injury to the psychological capacity or emotional stability of a person as evidenced by an observable change in behavior, emotional response, or cognition. It includes, but is not limited to punishments, threats, bullying, and not giving care and affection.
- **Neglect:** the persistent failure of a care giver to meet basic needs such as food, warmth and medical care, or to prevent exposure to any kind of danger.

Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. There are various types of exploitation including:

- **Sexual Exploitation:** It includes but is not limited to profiting monetarily, socially or politically from the sexual exploitation of another such as pornography or sexual slavery.

¹ Bond.org.uk. *safeguarding definitions and reporting mechanisms*

- **Economic/commercial exploitation or trafficking:** recruitment and involvement of vulnerable people in armed conflict, criminal activities, prostitution, child labor.
- **Survival Sex:** Occurs when a child or vulnerable adult living in poverty or in an emergency situation chooses to engage in or is coerced into sex as a last resort for survival. It is transactional sex in exchange for food, water, drugs, shelter, money and any other essential needs for integral human survival.²

Child Labor: This term generally refers to economic activities performed by a person under the age of 15.

Child Protection: Organized efforts to protect children from violence, abuse, neglect and exploitation.

Harassment: Behavior that annoys or upsets someone. It takes many forms and may be, but is not limited to, words, signs, offensive jokes, posters, statements, intimidation, physical assaults or contact, or violence. Harassment is not necessarily sexual in nature.

Sexual harassment: It includes any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person in particular when it contributes at creating an intimidating, or hostile environment. It may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature.

Inappropriate behavior of children towards other children: This encompasses any inappropriate behaviors or misconduct that negatively affect children and result in disciplinary procedures. Bullying has been highlighted in the definition below as it is a common form.

Bullying: The recurrent use of intimidation or coercion unto a peer. This behavior is characterized by the existence of a power imbalance and hostile intent.

Imminent Risk: All forms of abuse, threats or other circumstances endangering the safety and development of a child that require immediate judicial measures to prevent serious harm. These cases are the responsibility of the Ministry of Justice (Standard Operating Procedures for the protection of juveniles in Lebanon – SOP).

² Caritas Internationalis. *Children and Vulnerable Adults Safeguarding Policy*

Potential Risk: Threats that can affect the development and safety of a child but do not require immediate judicial measures. These cases are the responsibility of the Ministry of Social Affairs and partner child protection organizations. (Standard Operating Procedures for the protection of juveniles in Lebanon– SOP).

Standard Operating Procedures (SOPs): A set of instructions that describe the steps to be followed by all professionals working on the protection of juveniles in Lebanon, as well as the activities to be carried out.

Complainant: A person who brings an allegation regarding an incident or a policy violation to the attention of Fratelli. This person may be the survivor of the incident or another person who is aware of it.

Victim: A person who has experienced an exploitative or abusive situation. This term is often used in the legal and medical sectors.

Survivor: A person who has experienced an exploitative, or abusive experience. This term is often used in the humanitarian sector because it implies resilience.

Retaliation: any threat or detrimental action taken because an individual reported a misconduct in good faith or cooperated within an authorized investigation. When established, retaliation constitutes wrongdoing³.

³ UNFPA. Protection against Retaliation Policy.
https://www.unfpa.org/sites/default/files/admin-resource/Eths_Protection_Against_Retaliation.pdf

Introduction

Fratelli Association, hereinafter referred to as "Fratelli", is present in Lebanon in the center of Rmeileh. Fratelli tries to meet the emerging needs of the most vulnerable people: the poorest, the most exposed to risks and the people displaced because of the war. The Fratelli centers house about 1000 people with a staff of almost 60 people, of which about 50 are educators.

Fratelli is committed to protect children and vulnerable adults from any kind of exploitation, abuse and harassment. It aims to provide a safe environment and has zero tolerance towards all types of harm and abuse against children, young people or adults at risk, committed either by Fratelli staff⁴, volunteers, and associates or by any other entity involved in Fratelli's programs and activities.

The guidelines of this policy reflect, on the one hand, the evangelical values of freedom, justice and respect for all children and, on the other hand, as a consequence of these values, the principles of Fratelli's mission and its professional commitment thus recognized and respected. (Annex I).

Fratelli recognizes its duty to ensure that appropriate actions are taken to prevent and respond to any suspected or known incident of harm, abuse, exploitation or neglect.

Policy Statement

Fratelli aims to create a safe environment where children and vulnerable adults feel empowered and involved in their own protection, and where educators and staff are confident, competent and well-supported in meeting protection-related responsibilities. This commitment is born of the fundamental belief that each person deserves to be treated with love, respect and fairness. The dignity of every individual is inviolable. The safety and protection of children and vulnerable adults should always be considered a top priority and guiding principle of Fratelli's activity. Actions will be taken to improve the access of staff and beneficiaries to information that concerns them in these areas and to develop methods and means to ensure their meaningful participation in the policies that affect them.

⁴ "Staff" refers to any individual associated with Fratelli, including but not limited to volunteers, partners, visitors, suppliers, interns, trainees, full or part time consultants and contractors, board members and any other person who is actively involved in the work of the organization.

Purpose of the policy

The purpose of this policy is to:

- Institutionalize the safeguarding process by integrating it across programs and activities.
- Ensure that all personnel and beneficiaries themselves understand their moral and legal responsibilities in regard of Safeguarding.
- Ensure safe recruitment and training for Fratelli’s staff and personnel.
- Establish clear reporting guidelines and processes.
- Investigate any allegation of the Safeguarding policy violation.
- Take the appropriate steps to ensure a survivor’s centered approach, including referral and appropriate assistance as specified in the policy.

Policy Scope

This policy is mandatory for all Fratelli’s staff and associates, including personnel, board members, educators, council, community members, chaperones, suppliers, volunteers, full-time and part-time employees, interns, visitors, sessional workers, contractors, consultants, parents and children, program participants or anyone working on behalf of Fratelli. This policy applies to all situations during and outside working hours.

It is Fratelli’s responsibility to ensure that everyone is informed of the existence and content of this policy.

This policy covers the following key areas of safeguarding:

- Young people & adults at risk safeguarding;
- Child safeguarding;
- Protection from sexual exploitation, exploitation and abuse (PSEA).

Policy’s text

Core Standards

Fratelli is guided by the following international standards:

- The UN Convention on the Rights of the Child (CRC) signed and ratified by Lebanon on May 14, 1991.
- The UN Secretary General’s Bulletin of special measures for protection from sexual exploitation and sexual abuse.
- IASC (Inter-Agency Standing Committee) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse.
- The Core Humanitarian Standard on Quality and Accountability (CHS).

The policy is also in accordance with the Lebanese law 422/2002 ‘The Protection of Juveniles in Conflict with the Law and/or At Risk’, specifically articles 25, 26 and 27, and the National Standard Operating procedures for the protection of juveniles in Lebanon (SOP) adopted by the Ministry of Social Affairs.

Safeguarding policy values

Fratelli’s mission is guided by the following principles:

- a) Human-rights Approach: ensuring that children and vulnerable adults are able to live in dignity with all their rights guaranteed, including the right to a violence-free upbringing.
- b) Non-discrimination;
- c) Best interests of the poor;
- d) Right of every person to life, survival and development;
- e) Right of children to express their views in all matters affecting them.
- f) Zero tolerance of exploitation and abuse: such action attracts criminal, civil and disciplinary sanctions.
- g) Risk management: reducing the risks that may be associated with aid activities and training staff on their obligations.
- h) Co-operation: protecting children and vulnerable adults from harm is the collective responsibility of all community members including children, parents, teachers/staff as well as community agencies and community professionals.
- i) Participation and Inclusion: involving beneficiaries in their own protection is essential as they have their own perspective, can offer insight into issues they face and are best informed about their own situations.
- j) Confidentiality: ensuring that any sensitive information is protected, and only shared on a need-to-know basis.
- k) Transparency: Fratelli will follow published policies and procedures to deal with situations and will openly admit mistakes then respond to them appropriately.

Safe space

Fratelli will ensure that the physical space of its centers is safe for all beneficiaries including children. To that end, Fratelli will make sure that:

- The physical structure of the centers' buildings is sound (ex: there's nothing that can fall on students, walls and roofs are solid etc.)
- Beneficiaries do not have unsecured access to heights, such as unprotected rooftops and windows or dangerous areas.
- The center entrances and exits are supervised by a staff member and/or cameras.
- A staff member will be present at all times to supervise children while they are at the center, and in all areas (such as the playground, the toilets, classes, busses area etc.)
- There are not any materials that could cause physical harm or threaten (such as broken glass, exposed electrical wires).
- All toilets are regularly maintained, cleaned, separated for boys and girls, and supervised by a staff member.
- All children transported to and from Fratelli centers will be accompanied by a staff member.
- All buses meet basics safety standards (regular maintenance, basic cleanliness, safe driving speed, enough seating, and adequate student load).
- The centers have at least one fully stocked first aid kit that is regularly filled.
- The centers have a clear fire safety plan that includes fire alarms, accessible fire extinguishers, set assembly point, exit signs etc.
- The center has at least one staff member trained on using the first aid kit and able to brief other colleagues on fire safety plan when needed.
- The centers have a record of children's medical conditions such as allergies and medication and a record of an emergency contact, filled and documented by the center supervisor during the registration and updated when needed.
- The centers have daily records of student's attendance, and the center supervisor follows up with absentees by contacting parents seeking an explanation for absences.
- The parents or legal guardians will be informed in advance of the date, duration and place of the activity, the characteristics of the facilities and the personnel in charge of the activity (external or in-house personnel), and it is obligatory to have their prior written consent. This will also apply if the activity requires the child to spend the night away from home.
- Under no circumstances, except in cases of force majeure (fire, flood, etc.) or necessity due to the age or disability of the child, and upon written request of the legal guardians, will the staff in charge (external or in-house staff) share a room with the children. In the event of situations that put children at risk or disturbances that cannot be resolved by the children themselves, or if there are well-founded suspicions that tobacco, alcohol or other drugs are being consumed in a children' room, the educators (at least two) may enter to resolve the situation.

- During meetings or activities with children, always allow access to a third person, always leave the door open, never lock it, and preferably use or occupy rooms with windows or that allow you to see inside the room.
- In cases where children must be met alone, avoid reserved, private or isolated places, out of the sight or possible access of third parties.
- Students are not permitted on-campus before school opening hours.

Online learning

All principles and guidelines of the Safeguarding policy apply during online learning activities as well. Fratelli staff will maintain the same professional boundaries with students online that they are required to maintain in person (as per the code of conduct). They will also follow the same referral pathway to report if they suspect a risk of harm or abuse.

Safe workplace:

All employees, and particularly managers, have a responsibility for keeping the work environment free of harassment, discrimination and misconduct. Any employee who becomes aware of an incident of harassment, whether by witnessing the incident, being told of it, or being the object of it, has to report it in accordance with the Safeguarding Policy.

Structure and Responsibilities

Fratelli Council

Fratelli Council is composed of a group of brothers based in Rome and responsible for the support of the Fratelli project and the Fratelli community, and is therefore responsible for:

1. Approving Fratelli's Safeguarding policy.
2. Taking the appropriate measures for any allegation from a complainant against a member of the community (the brothers).

Safeguarding Focal Point

The Safeguarding Focal Point (SFP) is the assigned officer responsible for handling all witnessed or suspected cases of harm within Fratelli.

The SFP will have the following responsibilities:

- Know about the signs and symptoms of abuse.
- Understand and apply Fratelli's internal referral pathway which includes following the necessary reporting and informing procedures; conduct a primary assessment of the case, and discuss with the current principal/representative to determine the appropriate pathway (internal follow-up, referral to CP organization, or legal authorities).

- Document reports of Safeguarding allegations as appropriate using the assigned 'Reporting form' (Annex 8 – Reporting form).
- Apply confidentiality according to data protection procedures as outlined including password protecting soft copies and storing hard copies in a secure cabinet in a locked room (Annex 10 – Confidentiality and data protection.)
- Ensure that the wishes and feelings of survivors are respected, especially before any measures are taken, to ensure their safety.
- Make sure that all community members have signed the declaration of commitment to the Safeguarding policy and have been trained on Safeguarding

Safeguarding Team (ST)

The members of the ST enjoy the freedom, independence and authority necessary for the exercise of their functions, in order to carry them out in full transparency, always ensuring the rights of the beneficiaries, and assuming the duty of reserve and confidentiality of the information they have access to.

The Safeguarding Team (ST) includes:

- The Safeguarding Focal Point (SFP)
- The director of Fratelli
- The psychological advisor
- The reference educator of the beneficiary involved if needed
- The social worker if needed.

None of the positions of the ST members will be compensated.

The duties assigned are as follows:

- Obtain additional information about the reported abuse. The social worker will be the one to provide direction on how to obtain this information in the event that an interview should occur. For significant or serious cases, no interview will be scheduled with the alleged perpetrator and, depending on the circumstances of the case, the interview with the alleged victim or his or her parents will be assessed appropriately.
- Complete the Maltreatment Assessment Form to reach a conclusion on whether or not maltreatment exists or is suspected.
- Complete documentation, if any, as determined by the appropriate Department or Court regarding possible child abuse.
- To propose, in this case, possible new actions after having reached the conclusion about the existence or not of possible abuse or the presence of suspicions about it (for example, the examination of the minor or vulnerable adult by an expert physician).
- Carry out the possible new actions proposed in the Assessment Form. Nevertheless, those that, for reasons of urgency, must be adopted immediately for the protection of the child or vulnerable adult should be carried out.
- The ST participates in the review of the Safeguarding policy when necessary.
- The team will gather for two annual meetings that will be held during the first quarter of each school year, in order to establish a schedule of concrete actions, and the second meeting will take place at the end of the school year, in order to evaluate the

efficiency, effectiveness and impact of the actions carried out, and thus the respect of the Protocol. The ST will be reunited in each time needed to discuss any potential case of abuse.

An annual report on the implementation of and compliance with the Protocol will reflect the actions taken, including:

- Evaluation of the means of detection (observation, indicators, e-mail address for the defence of children or vulnerable adults, etc.).
- the number of cases, their evaluation and the measures taken.
- The economic resources of the Protocol. Human resources employed in the execution and implementation of the Protocol.
- Biannual comparison of the data considered relevant, in order to obtain a progressive evaluation of the results.
- The SFP is required to write the minutes of meeting for each meeting.

Staff

The Staff responsibilities are the following:

- Attend a training that covers all Safeguarding aspects: types of abuse, reporting and referral... The SFP will ensure that any new staff receives this training.
- Abide by the organization's code of ethics/code of conduct in their conduct and interactions (Annex 3).
- Read, understand and sign a declaration of commitment to the Safeguarding policy (at the end of this document), keeping a copy of it for their personal reference. It is encouraged that while reviewing the policy, staff members bring forward their questions and concerns to the SFP.
- Respect and apply the Safeguarding policy and contribute to the promotion of a safe environment.
- Report all witnessed and suspected cases of harm within Fratelli to the SFP.

Volunteers, interns and visitors, including volunteer parents, will be briefed on their roles and responsibilities by the SFP, as per the Safeguarding Policy. Any individuals with prolonged contact with beneficiaries must be briefed on the Safeguarding policy and must sign a declaration of commitment (see Annex 12). Short-term visitors or guest speakers should be briefed about the Safeguarding policy and be accompanied by trained staff to ensure the policy is not breached.

Administration

Administrative units have further responsibilities in addition to abiding to the general responsibilities of staff.

The staff members involved in hiring and training employees are expected to ensure the

required recruitment checks are carried out before an employee is hired. This primarily includes ensuring that staff members are free of previous misconducts. (see Annex 11).

Community/parents/Guardians

Fratelli recognizes that families within the community are the foundation of a healthy society. Accordingly, parents and guardians will be invited to:

- Attend awareness sessions to support in understanding, participating and promoting Safeguarding principles and practices.
- Discuss their concerns regarding the services provided by Fratelli staff.

Managing Referrals and Allegations

Allegations of abuse will always be taken seriously and will be investigated before any actions or decisions are taken.

Stakeholder's referral pathway

Staff member has information

The staff member may have information that indicates or confirms, that a beneficiary or other staff is experiencing abuse through: observing certain signs, receiving information indirectly, witnessing an incident or receiving a direct disclosure. Whenever a staff member has reasonable doubt that someone is experiencing any form of abuse, it is their responsibility to report this information to the SFP. Suspicions should not be personally verified by the reporter; investigations, when appropriate, are done by assigned specialist(s). As such, a reasonable suspicion is sufficient for any community member to make a report (defined by reporting procedures).

- Inside Organization: Allegations against beneficiaries or organization personnel

This is when a staff member obtains information about an incident of abuse that a child or vulnerable adult experienced involving an organization's employee. It could be an incident that the staff member witnessed or information that was disclosed to the staff member. This type of information will usually be sufficient to suggest that the child is in danger or was involved in an incident where he/she was harmed.

- Outside the organization: Allegations against individuals outside of the organization community

This is when the staff member has information that suggests that the incident of abuse in question involved an individual outside of Fratelli such as a family member, neighbor, or any individual not related to Fratelli in any way.

Reporting

Concerns and allegations can be reported through any of the following channels:

- To the direct line manager or, if not appropriate to the HR Director or, if not appropriate to Executive Director or President.
- In person to the Safeguarding Focal Point.
- Complaint/Suggestion boxes
- Email : byyourside.fratelli@gmail.com
- Special Hotline Number: 71 056 608
- Confidential face-to-face meetings during monitoring visits.

The report should include as much information as possible, including:

- Details of the incident;
- The name of each person involved (complainant, subject of complaint, witnesses, survivor)
- The nature of the alleged incident;
- Dates, times, and locations;

Anonymous complaints

Under some circumstances, people may have concerns disclosing their identities while registering the complaint. Therefore, anonymous complaints will be accepted and processed if there is sufficient evidence to appropriately investigate allegations.

Whether it is an allegation from outside of Fratelli or from within Fratelli, the staff members should refer to the Safeguarding Focal Point (SFP).

Reporting timeline

Staff members are encouraged to report as soon as possible to the SFP. As a general guideline, if the staff member has reason to believe that there is an imminent risk of danger (e.g. a direct disclosure of sexual abuse) then he/she must report within **24 hours**, otherwise, the staff member will need to report incidents/suspicious within **3 days**.

Allegations against the SFP or the Director

In case there are any concerns or suspicions about the conduct of the SFP then the concerned staff member should report directly to the Director.

When there are any concerns or suspicions about the conduct of the Director then the staff member should report either to the SFP who will then report to the President of the organization, or directly to the President.

Guidelines when receiving a disclosure

When an allegation or disclosure of harm is made, community members should:

- Find a quiet, private place to talk to the complainant

- Stay calm and listen carefully
- Reassure the complainant about his/her right to speak out and be safe.
- Avoid investigative and leading questions
- Inform the complainant that the case will be referred to the SFP
- Do not promise the complainant total confidentiality concerning the case, but do ensure that the case will only be discussed with the SFP and whoever is legally required to know, on a need-to-know basis.

A community member receiving a report should not:

- Express shock or disbelief
- Investigate to determine if the allegation is valid or invalid
- Call the child’s parents in case the complainant is a child
- Promise to keep the reported incident confidential
- Lecture or blame the complainant
- Convey anger or impatience if the complainant is not ready to discuss the incident

Communication with the SFP

Reports to the SFP must be done in person or over the phone. The staff member may choose to write down notes to ensure that no details are missed, however these must be destroyed once the information is delivered. The SFP will record available information in the reporting form provided in Appendix 8 and will make sure the staff member reporting has signed the form.

Community members that report a case should not discuss the case any further. Depending on the situation, the SFP may give them recommendations about how to deal with the survivor.

When staff members are in further contact with a person that has disclosed sensitive information to them, they should:

- Act normally with the complainant.
- Avoid mentioning sensitive details in any way in front of others.
- Preserve confidentiality.
- Use positive reinforcement to support positive behaviors and highlight the strengths of the complainant.
- Listen to the complainant if he/she wishes to discuss his feelings or the incident.
- Report to the SFP if there is no improvement or if the complainant seems distressed in any way.

Reponse:

When an incident is reported, the SFP will acknowledge receipt of the allegation by one week and analyzes the case to determine the best response.

The SFP should record available information in the reporting form provided in Annex 8 and make sure the complainant has signed the form.

In case the survivor is a child, the SFP can consult with a multidisciplinary team (psychologist, social worker, specialized team) at Fratelli to set an internal action plan. If this is not available, then it is highly recommended to consult with a child protection organization especially when there is a doubt about the course of action. Once sufficient information is collected, the SFP will assess the severity of the case to determine if the child is facing imminent risk or potential risk. The section on managing allegations will outline Fratelli's possible responses according to the source of harm.

In case the allegation comes from outside of Fratelli, the SFP should not attempt to intervene but rather should refer the case a CP organization. Once the issue is handled by the CP organization, the SFP no longer has any responsibilities to follow up on it; The same procedure occurs if the SFP decides to send the case to the legal authorities because of an imminent risk. The Judge, and the UPEL will take over the case.

In case the allegation comes from within Fratelli,

- *non-sensitive complaints:*

- These complaints are related to program implementation (e.g. quality of services, program delays, etc..).
- They will be transferred to the related program manager in order to be addressed. There is no Safeguarding violation.

- *Sensitive complaints:*

- These complaints are related to any violation of the Code of Conduct or the Safeguarding policy staff, volunteers, partners, board members, or any person representing Fratelli. These include:
 - **Fraud and corruption related complaints:** corruption, misuse of resources, favouritism, abuse of power, conflicts of interest, bribery, falsifying documents, intentional misuse of Fratelli's assets, submission of false expenditures for reimbursement, false invoices, blackmail, financing terrorism actions, ...
 - **Safeguarding related complaints:** abuse, exploitation, harassment, violent and inappropriate behavior, ...
- An administrative investigation shall be initiated if needed.
- If the case is sent to the legal authorities because of an imminent risk, a legal investigation will take place without any more intervention from Fratelli.

Referral

Assistance will be provided to the survivor according to each case and may include legal, medical or psychosocial support.

Investigation

All allegations will be confidentially evaluated while prioritizing the safety and well-being of victims/survivors and those affected at all stages.

All involved parties are expected to fully cooperate and participate in inquiries and investigations.

Investigations guidelines (Annex 10) can be summarized as follows:

1. The President will request to initiate a formal investigation and will appoint an investigation team (investigator and co-investigator). He might choose either staff members trained in safeguarding investigations or qualified external investigators with no conflict of interest.

When **complaints are raised against senior staff members**, the investigation must be conducted by an independent party.

3. Following evidence gathering and site visits, the investigator (s) will meet the complainant, the survivor (if he/she is different from the complainant), witnesses and finally the subject of complaint.

4. Upon completion of the investigation, the investigator (s) will prepare a final report with findings and recommendations.

5. If the allegations are proven to be substantiated, appropriate disciplinary measures will be taken by the management against the perpetrator(s).

In case of a sensitive allegation, the subject of complaint may be suspended or may be asked to change his/her work location during the investigation period.

The complainant can appeal the investigation's outcome in writing to Fratelli's director or president in case he/she does not agree with the proposed action.

Retaliation

Any adverse action or threat of an adverse action taken by the organization, or member thereof, in response to an individual's good faith disclosure of misconduct is prohibited, even if the report is proven to be, after investigation, unsubstantiated.

Retaliation includes, but is not limited to:

- Bullying and harassment from co-workers and/or manager;

- Discrimination, humiliation or insulting remarks;
- Adverse action against a staff member such as unsubstantiated negative performance evaluations, disciplinary actions, unjustified contractual changes, unfounded reduced task assignments;

Non-retaliation process applies to:

- a) Staff members who report, in good faith, actual or suspected safeguarding violations
- b) Non-staff members who report, in good faith, actual or suspected safeguarding violations, which includes beneficiaries, donors, partners, vendors, contractors ...

Complaints made in bad faith:

Any individual who intentionally makes a false complaint under this policy, or who intentionally misleads investigation may be subject to disciplinary actions.

[Data protection and storing information](#)

Any records that contain sensitive information will be stored using strict confidentiality and data protection guidelines outlined in the SFP toolkit (Annex 10). This includes information on how to password protect soft copies and clear guidelines on storage of hard copies.

A clear process needs to be put in place to remove identifying information.

Need-to-know basis

The SFP will only disclose information about a beneficiary to other members of staff and/or authority on a need-to-know basis. An authoritative party involved in the reporting pathway and legally mandated to handle incidents/cases of abuse will require information to intervene.

Consent before sharing information

Any information disclosed by a child or vulnerable adult cannot be shared without his/her consent, unless the survivor's safety is in imminent risk. Even then, the staff member must explain the necessity of reporting to the survivor.

Professional secrecy

All staff must be aware that the professional secrecy is lifted when informing/reporting (law 422, art. 26). All community members have the obligation to report cases of abuse and the right to report anonymously.

Spreading rumors about incidents or sharing details about cases constitute a serious break in confidentiality and would be referred to the SFP and director for appropriate action. All community members are expected to protect information and limit its spread at all times and

in all situations.

Use of Pictures and Media

Fratelli will make sure to obtain informed consent forms from a vulnerable adult or from a child's parent or caregiver before using and publishing any image and/or video portraying beneficiaries through its external communications. The images and videos will be used for advocacy of certain programs to reach the public and Al Fratelli will not use these images and videos for commercial purposes. Photographing or filming children will be made taking into consideration children's rights, integrity and dignity. In addition, awareness sessions will be made to parents and caregivers on ethical approaches for image gathering and publishing processes and usage. If the child is over 14 years old, it is recommended to get his/her consent in addition to the parents' consent.

Informed consent is also required from adults before any picture or video is

Staff Recruitment

Fratelli is committed to maintaining procedures to ensure the safe recruitment and selection of all its staff.

Information for applicants: There will be a clearly stated commitment to Safeguarding on all recruitment advertisements and staff contracts.

Background checks: Any person of Fratelli who is or could be in contact with beneficiaries, shall, in any case, hand over to Fratelli the following documents, knowing that additional documents may be required:

- Clean criminal record.
- Responsible declaration that he/she has never been charged or prosecuted in a criminal proceeding for a sexual offence or for violating the rights of children. (Annex 5).
- Declaration of compliance with the Protocol and the Code of Good Practice and Prohibited Conduct, in which he/she declares that he/she has received the Protocol and the Code and agrees to adopt them. (Annexes 3 and 4).

Fratelli will determine the most appropriate procedure for obtaining this documentation, designating a responsible person who will be in charge of ensuring compliance with the obligations described above. Fratelli will be responsible for its registration in the archives and its safeguarding. This documentation should be provided prior to any contact with beneficiaries.

It will be made clear to all applicants that any misrepresentations, falsifications, or material

omissions in the information provided by the applicant, whenever discovered, may result in disqualification from, or termination of employment or volunteer service with the organization. All hiring practices with regard to background checks and suitability for employment adhere to Lebanese law.

Training and policies' signature: In addition to screening and background checks, all newly appointed staff are asked to agree and sign all the policies developed by Fratelli's and will be trained on these policies.

Code of conduct for sub-recipients and suppliers:

Any sub-recipients or supplier of Fratelli must comply with Fratelli's Safeguarding policy, report any allegation related to programming or impacting Fratelli's reputation, and fully cooperate to undertake any investigation or corrective action if needed. Failure to comply may result in termination of the agreement without penalty to Fratelli (Annex 13).

Community awareness

It is vital that the Fratelli's commitment to the highest possible standards of safeguarding and child protection for all students is communicated clearly to the variety of stakeholders who come into contact with the organization.

The Safeguarding Policy and related procedures are available on request. Guidance and resources on student safety issues can be provided by the counselors.

Beneficiaries: Fratelli's team provides specific awareness sessions for beneficiaries that focus on Safeguarding such as personal safety, bullying, strategies for dealing with difficult situations. Beneficiaries are encouraged to participate in further promoting Safeguarding values through student-led activities and initiatives.

If a beneficiary is experiencing or has knowledge of an incident of violence or abuse, they are encouraged to report this information to receive support.

Parents: Fratelli's team provides specific awareness sessions for parents that focus on using nonviolent technics in child raising and role of parents in child protection.

Safeguarding policy diffusion

The diffusion of the Safeguarding policy will be through different channels: Fratelli's newsletter and website, Informative brochures, meetings and awareness sessions, visible posters.

Policy Review and Accountability

The review of the policy with respect to the persons involved must be carried out every 2 years by the director and amended as necessary.

In order to ensure the effective implementation of the policy and to adapt it to the changes that make it necessary, whether they be regulatory changes or internal changes in Fratelli that may affect it (for example, the creation of new centers, new activities of Fratelli, or new departments, etc.).

The Fratelli Council would be responsible for final approval of any revisions and/or amendments to the Protocol.

Lifecycle

Date	Revision
Aug. 2024	First implementation
Aug. 2026	Next review date

Signature's table

	Name	Function	Date	Signature
Written by	Dr Olga Haddad Issa	Safeguarding Advisor Consultant	Aug 2024	
Validated by	Br. Juan Carlos Fuertes	Project Manager	Aug 2024	
Approved by		Fratelli Council	Dec 2024	

References

- Fratelli Child Protection policy written by Himaya.
- Caritas Internationalis Safeguarding policy
- CAFOD Complaints Handling Policy and Procedures for International Programmes.
- UNFPA. Protection against Retaliation Policy
- CRS sub-recipient code of conduct template
- Catholic Social Teaching
- CHS guidelines for investigations

Annexes

Annex 1: Vision, Mission, values

VISION:

The protection and defense of the rights of children and vulnerable adults, promoting the socio-educational inclusion of each person so that he or she can be the main actor in the development of a more just, cohesive and equitable society.

MISSION :

- To promote the personal development of children and vulnerable adults, starting from an integral approach to the person, targeting their primary and emergency needs.
- To offer spaces and moments for socio-educational projects that respond to different needs.
- To accompany the children and vulnerable adults in their life project by assuring an attentive presence, adapted and close to each one.

VALUES :

Attention to the most vulnerable:

Preference for the most fragile inspires us with a person-centered pedagogical style characterized by closeness, free dedication, and welcome in diversity.

Spirit of fraternity:

The word FRATELLI (brothers and sisters) expresses the family spirit that we wish to give to any project and to our relationships both educational and personal. We believe in teamwork and networking with other institutions.

Commitment to justice and peace:

In countries of great cultural and religious diversity FRATELLI is committed to peace education. Our work is characterized by the promotion of dialogue, respect and acceptance, within a framework of equal opportunity for people and communities.

Insertion and Presence:

We want to reach children, youth, vulnerable adults and families where they are; create and manage programs that are tailored to their needs, sharing our resources and valuing theirs

Joy and Hope:

Through our attachment to faith, even in situations of crisis or pain, we will remain close to children and vulnerable adults as witnesses of hope and joy.

Annex 2: Types, forms and indicators of child abuse

Identification is a key factor in responding to child abuse and neglect. Due to the time they spend with children, educators have the opportunity to observe the behaviors of children in a variety settings and circumstances and identify potential indicators of child abuse.

A single indicator is usually insufficient to prove that abuse is taking place. However, the repetition of an indicator or a combination of indicators should alert educators to the possibility of abuse. Moreover, the same signs may be indicative of more than one type of abuse.

This list is not all-inclusive and can be used as a guide only.

Remember: As staff/educators, your role is not to investigate suspected abuse. Your role is to convey your suspicions and concerns to the Safeguarding Focal Point (SFP) directly or indirectly, who will assess the suspicions/report to the proper authorities.

Physical Abuse		
Forms	Physical Indicators	Behavioral Indicators
<ul style="list-style-type: none"> - Assault: slapping, hitting, scratching, biting, punching, kicking, grabbing by the neck - Violent handling: shoving, pulling, dragging - Choking/smothering - Burning - Shaking a young child (0 to 3 years old) - Severe corporal punishment - Assault with an object or weapon - Causing an injury that results in hospitalization - Holding captive (or hostage) 	<ul style="list-style-type: none"> - Unexplained bruises and welts: <i>on face, lips, mouth, eyes, torso, back, buttocks, thighs</i> - Bruises in various stages of healing <i>clustered, forming regular patterns marks reflecting the shape of the article used to inflict the injury (i.e., electric cord, belt buckle) regularly appear after school absences, weekends, or vacations</i> - Unexplained burns: <i>cigar, cigarette burns, especially on soles, palms, back or buttocks immersion burns (sock-like, glove-like or doughnut-shaped) patterned like electric burner, iron, etc. rope burns on arms, legs, neck, or torso</i> - Unexplained fractures: <i>to skull, nose, facial structure in various states of healing, multiple or spiral fractures</i> - Unexplained lacerations or abrasions: <i>to face, mouth, lips, gums, eyes, torso, arms, back, buttocks, thighs to external genitalia, human bite marks, bald spots</i> - Untreated medical or dental problems 	<ul style="list-style-type: none"> - Apprehensive when other children cry - Behavioral extremes, such as aggressiveness, withdrawal, or being overly compliant - Afraid to go home (or to go to a specific location) - Reports injury by caretaker - Complains of soreness and moves awkwardly - Self harm and violent behavior towards others - Wears clothing that covers body and is not appropriate for the weather - Chronic runaway (especially adolescents) - Uncomfortable with physical contact or touch - Seems frightened of parents and caregivers (or of a particular adult) - Apt to seek affection from any adult - Decline in school performance - Fear of making mistakes for fear of being harmed (which could lead to behaviors such as not submitting classwork) - Hyper vigilant - Gives implausible explanations of injuries

Psychological Abuse		
Forms	Physical Indicators	Behavioral Indicators
<ul style="list-style-type: none"> - Belittling, degrading and other nonphysical forms of hostile or rejecting treatment of child - Shaming and/or ridiculing the child, including the child's physical, psychological and behavioral characteristics - Consistently singling out one child to criticize and punish, to perform most of the household chores, or to receive fewer rewards - Public humiliation - Restricting, interfering with or directly undermining the child's important relationships (e.g., restricting a child's communication with his/her other parent, making frequent derogatory comments about other parents, placing the child in a loyalty conflict by making the child unnecessarily choose to have a relationship with one parent or the other, blaming the child for marital or family problems etc.) - Manipulation (e.g., inducing guilt, fostering anxiety, threatening withdrawal of love) - Failing to express affection, caring, and love for the child and showing little or no emotion in interactions with the child - Threatening to abandon or abandoning the child - Setting rigid or unrealistic expectations with threat of loss, harm, or danger if they are not met - Demonstrating a pattern of negativity or hostility toward the child (e.g. the caregiver screams at 	<ul style="list-style-type: none"> - Loss of previously acquired developmental skills such as regression in toilet training - Failure to thrive i.e. low weight for the child's age (especially in infants) - Headaches or stomach aches with no medical cause - Ulcers 	<ul style="list-style-type: none"> - Habit disorders (sucking, biting, rocking, etc.) - Conduct disorders (oppositional, defiant, antisocial, destructive, etc.) - Sleep disorders - Eating disorders - Inhibition of play - Overly adaptive behavior: inappropriately adult-like or inappropriately infantile - Speech disorders - Loss of self-confidence or self-esteem - Depression, anxiety and suicidal thoughts and behaviors - Social withdrawal or a loss of interest or enthusiasm - Desperately seeks affection - Avoidance of certain situations, such as refusing to go to school or ride the bus - A decrease in school performance or loss of interest in school - Delinquent behavior (especially adolescents) - Drug and/or alcohol abuse - Risky sexual behavior - Self-harm

<p><i>the children that they can never do anything right)</i></p> <ul style="list-style-type: none"> - Threatening or perpetrating violence (<i>which is also physical abuse</i>) against the child, or threatening or perpetrating violence against a child's loved ones or objects, including domestic/intimate partner violence observable by the child - Using fear or intimidation as a method of disciplining. - Thwarting the child's developing sense of maturity and responsibility (<i>e.g. infantilizing the child</i>). - Allowing little or no opportunity or support for child's views, feelings, and wishes - Exposing the child to extreme, unpredictable, and/or inappropriate behavior (<i>e.g. drug use in front of the child</i>) 		
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Sexual Abuse		
Forms	Physical Indicators	Behavioral Indicators

<ul style="list-style-type: none"> - Making a child take their clothes off or taking off one's clothes in front of a child - Fondling of child's genitals or breasts - Masturbation in the presence of a child or forcing the child to masturbate - Discussing sex explicitly in front of a child - Exposing a child to sexual acts - Forcing or encouraging a child to take part in sexual activity - Sexual acts of any kind with a child, including vaginal, oral, or anal sex - Vaginal or anal penetration by a penis, finger or any other object - Sexually exploiting a child for money, power or status - Exposing the child to or involving the child in pornography - Producing, owning, or sharing pornographic images or movies of children - Any other sexual conduct that is harmful to a child's mental, emotional, or physical welfare 	<ul style="list-style-type: none"> - Difficulty in walking or sitting - Torn, stained, or bloody underclothing - Pain or itching in genital area - Pain on urination - Bruises or bleeding in external genitalia, vaginal or anal areas - Venereal disease - Odor in genital area - Frequent urinary or yeast infection - Red or swollen genital area - Bedwetting and fecal soiling beyond the usual age - Sexually transmitted infections - Frequent unexplained sore throat - Excessive masturbation - Frequent psychosomatic complaints (e.g stomach aches) - Regression in toilet training - Extreme weight loss/gain - Pregnancy - Physical maturation beyond the child's age (ex. breast or menstrual cycle at age 7 or 8) 	<ul style="list-style-type: none"> - Difficulties in concentrating - Frequent absences from school, many times justified by parent/caretaker - Abrupt change in child's behavior/moodiness - Depression- excessive crying - Clinging behavior - Low self-esteem - Reluctance to undress for physical education/nurse - Unwillingness to participate in physical/recreational activities - Afraid to be alone with adults - Wary or threatened by physical contact, closeness - Severe drop in school performance - Overly-sexualized behavior toward peers or adults (such as undressing in class or asking classmates to undress, eagerness to expose "private body parts" to adults) - Persistent and inappropriate sexual behavior - Repeated attempts to run away from home - Poor peer relationships - Pseudo-maturity - Self-harm e.g. suicidal threats or attempts - Detailed and age-inappropriate understanding of sexual behavior - Unexplained money or gifts
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Neglect		
Forms	Physical Indicators	Behavioral Indicators
<ul style="list-style-type: none"> - Not providing the child with enough food - Not providing the child with proper shelter - Not providing the child with adequate clothes - Failing to keep a child safe from danger (for example leaving children on their own unsupervised for long periods of time) - Depriving a child of an education, failing to send child to school - Letting a child's injuries, health issues or dental problems go untreated - Ignoring the advice of a doctor or dentist, refusing to allow a child to be treated and not taking children to routine appointments such as vaccinations. - Not giving the child proper structure, age appropriate rules (bedtime hours, curfews, balance between study and playtime etc.) - Leaving a child with an impaired caregiver. 	<ul style="list-style-type: none"> - Poor growth or weight gain - Consistent hunger - Inappropriate dress, clothing dirty or wrong for the weather - Poor hygiene - Unattended physical problems or medical needs - Emaciated features - Untreated injuries, medical and dental issues - Not being given appropriate medical treatment - Repeated accidental injuries caused by lack of supervision - Poor muscle tone or prominent joints - Skin sores, rashes, flea bites, scabies or ringworm - Thin or swollen stomach - Tiredness - Faltering weight or growth and not reaching developmental milestones (known as failure to thrive) 	<ul style="list-style-type: none"> - Begging, stealing food - Constant fatigue, listlessness or falling asleep - States there is no caretaker at home - Frequent school absence or tardiness - Self harm and violent behavior towards others - School dropout (adolescents) - Poor language, communication or social skills - Lack of age appropriate supervision - Alcohol/drug use - Disorderly behavior, juvenile delinquency - Abrupt change in child's behavior/moodiness - Difficulties concentrating

References

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http://www.who.int/violence_injury_prevention/violence/world_report/en/

Trentham B. (2007). *The school's role in the intervention of child abuse and neglect: A resource manual for school personnel*. Retrieved from Oklahoma State Department of Health website on

<https://www.ok.gov/health2/documents/School%20Reporting%20Manual%2007.pdf>

Annex 3. Code of Good Practice and Prohibited Conduct

In order to avoid any behavior that could constitute possible abuse (physical, psychological or sexual), the following Code has been established:

- Good practices: actions that promote the good treatment of the person, respecting his rights and freedoms.
- Prohibited behaviors: actions whose execution is strictly forbidden and which may even lead to penal sanctions.

The Code of all these behaviors will serve as a reference for all members of Fratelli, in order to promote a treatment in favor of the child or the vulnerable adult, its protection and its well-being. The actions listed in the Code can be modified and, if necessary, developed, according to the different activities to be carried out by Fratelli.

Fratelli should communicate this Code of Good Practices and Prohibited Conduct and require compliance by all persons, without exception, who may have contact with beneficiaries.

A written record should be kept of the delivery of the Code of Good Practices and Prohibited Conduct, the requirement for compliance and the commitment to enforce it in all aspects of our relationship with beneficiaries

GOOD PRACTICES

- 1- Treat all beneficiaries with respect and in accordance with Fratelli's principles of close presence and love.
- 2- Respect the evolutionary development of minors according to their age, respect their limits, help them become aware of their rights and defend them.
- 3- Use appropriate and respectful language, avoiding the use of obscene words or coarse expressions.
- 4- Dress appropriately and decently according to the place and the activities to be developed .
- 5- In activities carried out with minors, deal with subjects and use means (vocabulary, recordings, films, games or any other form of personal interaction or entertainment) that would be used in the presence of parents or legal tutors.
- 6- Use cell phones or other electronic devices (tablets or other) while performing assigned tasks, only when their use is necessary to complete the current activity.
- 7- During meetings or activities with minors, always allow access to a third person, always leave the door open, never lock it, and preferably use or occupy rooms with windows or that allow you to see inside the room.

8- In cases where minors must be met alone, avoid reserved, private or isolated places, out of the sight or possible access of third parties.

9- To have the explicit and written consent of parents or legal guardians for the performance of extracurricular and co-curricular activities that take place on or off the establishment premises. The same principle applies to reinforcement or support activities carried out voluntarily outside school hours.

10- To carry out activities with minors, organized by Fratelli outside the school or social work premises, according to the following guidelines:

- The parents or legal guardians will be informed in advance of the date, duration and place of the activity, the characteristics of the facilities and the personnel in charge of the activity (external or in-house personnel), and it is obligatory to have their prior written consent. This will also apply if the activity requires the child to spend the night away from home.
- Under no circumstances, except in cases of force majeure (fire, flood, etc.) or necessity due to the age or disability of the child, and upon written request of the legal guardians, will the staff in charge (external or in-house staff) share a room with the minors. In the event of situations that put minors at risk or disturbances that cannot be resolved by the minors themselves, or if there are well-founded suspicions that tobacco, alcohol or other drugs are being consumed in a minors' room, the educators (at least two) may enter to resolve the situation.

11- Avoid having a staff member alone with minors, in an isolated area, in the following cases:

- To perform intimate care that they may need for their age or disability (help with their cleanliness, etc.) or for health reasons (applying cream, etc.). This always requires the written permission of the child's legal guardian.
- To provide medical or other care (caring for a wound, changing a bandage, administering medication, etc.).

PROHIBITED CONDUCT

1- Legal prohibition.

All behaviors are forbidden, the performance or omission of which is legally prohibited (Penal Code or any other law protecting fundamental rights). Likewise, any type of mistreatment or abuse is expressly prohibited ("zero tolerance" for child abuse).

Any person under the age of 18 is considered a minor. Child abuse is considered to be

- any type of harm (physical, psychological, etc.) caused non-accidentally, by a person older than him, stronger or with authority, known or unknown to the minor;
- endangering the safety and well-being of the child.

2- Express prohibition.

Without prejudice to the provisions of Article 1, it is expressly forbidden to:

- favor, in a particular way, some persons to the exclusion of others, or to harm them, thus giving rise to a form of discrimination based on race, sex, age, culture, disability, religion, sexual orientation, social level, political thought, etc.
- behaving with children or vulnerable adults in a manner that could be considered abusive, exploitative or likely to harm or endanger the child.
- inflict any type of physical aggression, violence or intimidation.
- inflict verbal, psychological or emotional aggression that may hurt or ridicule the child or vulnerable adult (insulting, humiliating, belittling or ridiculing a minor).
- use forms of correction with minors that include rude, threatening, intimidating, contemptuous, humiliating attitudes or expressions, to inflict physical punishment, or to perform physical exercises that are exaggerated for their age or physical condition.
- Prevent children from being heard, listened to and expressing their opinions.
- Promote, provide or allow minors to consume alcohol or drugs.
- Possess or be under the influence of alcohol or drugs in the presence of minors.
- use the toilets, locker rooms, showers or any other dependencies put to the exclusive use of minors. In the case of non-exclusive use, it shall not coincide with the use of minors, except in the case of situations of risk to minors, or disorders that cannot be resolved by the minor himself or herself, or in the case of justified suspicions of the use of tobacco, alcohol or other drugs in these premises.
- allow minors to use restrooms, locker rooms, showers, or any other outlets intended for similar purposes for the exclusive use of adults. In the event of an emergency need, the use shall not coincide with the use of such dependencies by minors.
- participate in instant messaging groups or social networking groups involving children or other beneficiaries.
- take pictures of minors without prior parental or legal guardian consent and without the necessary safeguards to protect their privacy.
- leave the center with the child without the written consent of the parents or legal guardians.
- visit the child in his or her home without the presence of the parents or legal guardians.
- hosting or inviting the minor to a private address or home without the presence of parents or legal guardians.
- offer, give or promise gifts, presents or other rewards to minors and vulnerable adults that are not justified by prizes for school or extracurricular activities.
- Have any type of physical contact with a minor that could be considered inappropriate (rubbing, patting, massaging, etc.) or encourage the child to have such contact.
- Allowing inappropriate attitudes or signs of affection from minors or vulnerable adults.
- engaging in any type of sexual contact (touching of genitals or other body parts such as thighs, buttocks, chest, mouth, etc.) or contact with a minor that could be construed as sexual (kissing, fondling, groping, etc.) or inducing the child to have such contact.
- use minors or vulnerable adults for physical or emotional comfort or to share private or personal information private or personal information with them.
- observe, photograph or record minors in locker rooms, showers or any other areas for their exclusive use.
- facilitate or divulge directly or indirectly to minors and vulnerable adults, by any means (printed, visual or other), morally inappropriate or pornographic material.
- contact a minor or a vulnerable adult via the Internet, telephone or any other information and communication technology, in order to provide him/her with pornographic material,

or to show him/her pornographic images in which he/she is represented or in which another minor appears.

- provide, facilitate directly or indirectly to the minor or the vulnerable adult, by any means (printed, visual or other), sexual material, unless it is introduced in a programmed educational activity that is always in accordance with the age and development of the minors (for example, the course of sexual-affective education, workshops of self-protection against abuse, etc.)
- Any type of sexual conduct with minors and vulnerable adults , even if there is no physical contact with them and regardless of the medium used (e.g. webcam images or conversations). This includes:
 - Making obscene or sexualized gestures or comments.
 - Initiating into any sexual practice.
 - Asking for sexual favors.
 - Telling about personal sexual experiences, or those of others.
 - Displaying any type of exhibitionism. This includes:
 - Showing intimate body parts to minors or asking them to do so.
 - Undressing or being naked in the presence of minors or requiring them to do so.

Annex 4. Reception of the Safeguarding Policy

Mr/Mrs -----,

Holder of identity card no. -----

Residing at (detailed address) -----

Telephone number -----

E-mail address -----

Position -----

within the organization/institution : -----

DECLARES

1) I have received a copy of the Safeguarding Policy.

2) I am aware that the Holder Entity (Fratelli) requires compliance with this Safeguarding Policy.

Date: _____

Signature: _____

Annex 5. Reception of the Code of Good Practice and Prohibited Conduct

Mr/Mrs -----,

Holder of identity card no. -----

Residing at (detailed address) -----

Telephone number -----

E-mail address -----

Post: -----

within the organization/institution : -----

DECLARES

- 1) To have received a copy of the "Code of Good Practices and Prohibited Conduct".
- 2) Be informed that the Holder Entity (Fratelli Association) requires compliance with this Code.

Date: _____

Signature: _____

Annex 6. Self-declaration

Mr/Mrs -----,

Holder of identity card no. -----

Residing at (detailed address) -----

Telephone number -----

E-mail address -----

Position: -----

within the organization/institution : -----

DECLARES

that I have never been charged or prosecuted in any criminal proceeding for a crime of a sexual nature, or for violating the rights of any person, nor have I had a criminal record for conduct related to such crimes or against such rights.

Date: _____

Signature: _____

Annex 7: Risk Assessment

Determining the level of risk in a case of abuse depends on the dynamic analysis of four main factors as per the Standard Operating Procedures for Juvenile Protection in Lebanon (SOP):

- The nature, severity and recurrence of the reported facts
- The juvenile's age, personal traits and degree of vulnerability
- The ability and willingness of the parents/guardians to contribute to the safety and development of the juvenile
- The available social resources to provide assistance to the juvenile and his/her parents/guardians

To simplify this process for the organization setting, the SFP should focus on collecting information on the following factors for adequate assessment. The SFP should contact a child protection organization whenever they are uncertain of the outcome:

- Frequency of harm
- Type of harm
- Severity of harm
- Source of harm
- Duration of harm
- Probability of future harm
- Vulnerability of the child

Frequency of harm:

- Number of incidents over a time period
- Knowing the incident is recurring
- Concerns registered from the past

Type of harm

- Physical, psychological, sexual or neglect (can be more than one)
- Any other types of abuse they are exposed to e.g. domestic violence or intimate partner violence

Severity

- How likely is the incident to cause harm
- Potential impact of the harm or its signs in the organization setting

Source of harm

- The relationship of the child and the perpetrator or source(s) of harm
- The ability of the source to reach the child

Duration

- The period of time in which the harm has occurred
- Accumulation of harm over time and its impact

Probability

- Estimating the likelihood or probability that future harm will occur

Vulnerability

- Age of a child, any disabilities, medical conditions and social isolation

Risk assessment is dynamic as it provides a snapshot of the case which can change in the future, therefore ongoing monitoring of a child is necessary when they have not been referred. The objective of the risk assessment is to ensure the wellbeing of a child and identify the need for interventions in a timely manner.

It is not necessary to collect information on all of the factors listed above however, with as much information as possible, it will be possible to determine if there is imminent or potential risk.

Annex 8: Law 422/2002

In this section you will find more information about Law 422/2002 on the Protection of Juveniles in Conflict with the Law and/or at Risk summarized in English as well as the original Arabic text of articles 25, 26 and 27 which are the most relevant for the purposes of this policy.

The full version of law 422/2002 is available in circulation online and can be accessed for those interested: **Beirut Bar Association website** (نقابة المحامين في بيروت), https://bba.org.lb/content/uploads/Institute/141211103338689~loi%20422%20delinquent_arabe.pdf

Law 422/2002 overview

On June 6, 2002 law 422 on the Protection of Juveniles in Conflict with the Law and/or at Risk was adopted.

The **law 422/2002** defines a **unified protection system** for any child/minor (human being under the age of eighteen) on the Lebanese territory. It addresses the functioning of juvenile courts with an **emphasis** on **educational** and **rehabilitative** measures rather than punishment.

According to **Article 25** of this law, the child is considered exposed to danger when:

- He/she is in an environment exposing him to **exploitation** or **adversely affecting** his/her **health, safety, morality, or upbringing**
- He/she is exposed to **sexual abuse** or **violent corporal attack** beyond the customary non-harmful disciplinary measures
- He/she is found in a state of **vagrancy** or **homelessness**

According to the **Article 26** of the law 422/2002, can report child abuse:

- Any person that has knowledge or doubts about a child being abused
- Any professional that is in contact with children (doctor, teacher, social worker, psychologist etc.)
- Parents or caregivers
- The child himself/herself

Mandatory reporting

No person should conceal any facts or information related to the security and safety of a Child.

It is the obligation of every person, whether a professional or not, who has doubts, facts or information that lead him/her to think that a juvenile may be at risk:

- To report such matters to the **judicial authorities**
- To inform the Ministry of Social Affairs **MOSA**
- To inform non-governmental organizations **NGO** (ex: himaya)
- Any person who informs/reports **can remain anonymous**
- **Professional secrecy is lifted** when reporting (art. 26, law 422/2002)
- **Failure** to render assistance to any person in danger **could be punished by law (art 567, Penal Code)**

According to the **Article 27** of the law 422/2002, the intervention of the Juvenile Judge is resumed as follows:

- Setting hearings with the child and his/her parents/guardians or one of them
- Delegating a social representative to assess the situation of the child
- Taking the appropriate measures for the protection of the child:

e.g.:

- keep the child in his/her natural environment
- assign the child to a social institution sponsored by the corresponding ministries

The social worker assigned to work with the child will be asked to submit periodic progress reports to the judge

Original articles 25, 26 and 27 from law 422/2002

المادة 25

يعتبر الحدث مهددا في الأحوال الآتية:

- إذا وُجد في بيئة تعرّضه للإستغلال او تهدد صحته او سلامته او اخلاقه او ظروف تربيته.
- اذا تعرّض لاعتداء جنسي او عنف جسدي يتجاوز حدود ما يبيحه العرف من ضروب التأديب غير المؤذي.
- اذا وُجد متسولا او مشردا.
- يُعتبر الحدث متسولا في إطار هذا القانون اذا امتهن استجداء الاحسان بأي وسيلة آانت. ويعتبر متشردا اذا ترك مسكنه ليعيش في الشوارع والمحلات العامة او لم يكن له مسكن ووجد في الحالة الموصوفة آنفا.

المادة 26

للقاضي في أي من هذه الاحوال، ان يتخذ لصالح الحدث المذكور تدابير الحماية او الحرية المراقبة او الإصلاح عند الاقتضاء.

يتدخل القاضي في هذه الأحوال بناء على شكوى الحدث او احد والديه او أوليائه او اوصيائه او الأشخاص المسؤولين عنه او المندوب الاجتماعي او النيابة العامة او بناء على إخبار. عليه التدخل تلقائيا في الحالات التي تستدعي العجلة. على النيابة العامة او قاضي الأحداث ان يأمر بإجراء تحقيق اجتماعي وان يستمع الى الحدث ووالديه او احدهما او الوصي الشرعي او الأشخاص المسؤولين عنه، وذلك قبل إتخاذ اي تدبير بحقه ما لم يكن هناك عجلة في الأمر فيكون ممكنا إتخاذ التدبير الملائم قبل استكمال الإجراءات السالف ذآرها. ويمكن الاستعان بالضابطة العدلية لتقصي المعلومات في الموضوع.

لا يعتبر إفشاء لسر المهنة ولا يقع تحت طائلة احكام قانون العقوبات اي إخبار يقدم الى المرجع الصالح ممن هو مطلع بحكم وضعه او وظيفته او فنه على ظروف الحدث المعرض للخطر في الأحوال المحددة في المادة 25 من هذا القانون.

المادة 27

للقاضي بعد الإستماع الى الوالدين او احدهما، ان يُبقي الحدث قدر المستطاع في بيئته الطبيعية، على ان يعين شخصا او مؤسسة اجتماعية للمراقبة وإسداء النصح والمشورة للأهل والأولياء ومساعدتهم في تربيته، وعلى ان يقدم هذا الشخص او المؤسسة الى القاضي تقريرا دوريا بتطور حالته. وللقاضي، اذا قرر إبقاء الحدث في بيئته، ان يفرض عليه وعلى المسؤولين عنه موجبات محددة، أن يدخل مدرسة او مؤسسة اجتماعية او صحية متخصصة ان يقوم بعمل مهني ما.

للقاضي فرض التدابير المنوه عنها اعلاه في حال خروج الحدث على سلطة اهله واوليائه واعتياده سوء السلوك الذي يعرضه للمخاطر السابق ذآرها وذلك بناء على شكوى هؤلاء او طلب المندوب الاجتماعي

Annex 9: Reporting form

It is not necessary to fill in the entire table as the main aim of this form is to facilitate contact with the victim and their family.

This form must remain confidential and must be preserved in a secure location where access is limited to the SFP.

Organization:			
Organization Address:			
SFP name:			
SFP contact:			
<u>Survivor's Description</u>			
Full Name			
Nationality			
Sex			
Age			
Grade			
Address and contact number of the survivor			
<u>Family of the child subjected to abuse in case of a child abuse</u>			
Family Member	Name	Present (Yes/No)	Address and Telephone number

Father			
Mother			
Sibling			
Sibling			
Sibling			
Other			
Other			

About the concern

Was this a concern/suspicion or a disclosure of abuse?	
Who informed you about the suspicion or disclosure? (Name, position)	
When did the survivor disclose the incident? (Date & Time)	
Description of incident:	
Date & Time of Incident	
Location of Incident	
Name and job title of alleged perpetrator including relationship to child	

Your personal observations: (visible injuries, child's emotional state etc.)

Signature of reporter: _____

Signature of SFP: _____

Date: _____

Annex 10: Confidentiality and Data Protection

Confidentiality:

- The information collected from a survivor should only be shared with his/her consent.
- Only when deemed necessary should information be shared against the will of the survivors (e.g. High risk cases that require CP organizations intervention) but the reason for why should be explained to them nonetheless.
- Children should be given the opportunity to highlight information that they do not want disclosed to particular people.
- Complainants and survivors have the right to view any information written about them at any time.
- Information should only be passed to the person that is meant to receive this information.
- **Need-to-know:** the limiting of information that is considered sensitive, and sharing it only with those individuals for whom the information will enable to protect the survivor.

Paper Records Security:

- Label the files individually using the branch location, initials of the survivor and a code consisting of the Day, Month and year e.g. RL130617 or AS150217
- At no time should the survivor's name appear on the outside of the file.
- Kept in a secure place with limited access and locked in a cabinet.
- Room should be locked when the person responsible is not inside of it.

Security of Copies stored on a PC:

- The PC should be password protected and in a room with limited access.
- Updated anti-virus should be on the computer.
- All records should be saved in a single folder that is not obvious to find on the desktop
- Records should be labeled using the branch location, initials of the survivor and a code consisting of the Day, Month and year e.g. RL130617 or AS150217
- All records with sensitive information should be password encrypted on Microsoft word.
- Passwords should be recorded and saved in the SFP's email using only the label that is common to the written form and the soft copy
- The survivor's name should not be recorded on the file name or any document that is not encrypted

How to Encrypt a Word Document:

N.B. This process may differ depending on the version of Microsoft Word that is being employed. In case of any discrepancy, kindly search for the steps on Google.com or on Microsoft Word Help (Click F1).

The process of encryption is important to ensure that, in the case that there is any unauthorized access to the PC, then sensitive information will remain secure.

1. Click on “File” on the top left corner of the page
2. On the Info tab you will see the “Protect Document” option
3. Click on “Protect Document” and select “Encrypt with Password”

On a Macbook:

1. Click on “Word” on the top of the document
2. Choose Preferences (Alternatively type “Cmd + ,”)
3. Click on Security on the bottom of the window that pops up
4. Insert the password that you would like to use under the “password” field.
5. Select the password and re-enter it for confirmation.
6. Make sure to save your document and to close it once you have finished viewing it.

Annex 11: General Guidelines for Internal Investigations:

This document provides general guidance on how to conduct an internal investigation of personnel in an organization. This document in itself is insufficient for conducting an effective investigation as investigators typically have specialized training and as the organization itself should work to further develop its own internal proceedings; further resources will be provided at the end of the document.

Internal Investigations

An internal investigation may be required when credible information indicates significant wrongdoing, misconduct or ethical lapses in the organization. Allegations may come from multiple sources including faculty, non-teaching staff, parents or children.

Purpose of Investigations

The purpose of an investigation is to obtain relevant and accurate information to make informed decisions about whether or not an allegation or a complaint is true. It is a fact-finding exercise that will determine the validity of claims and inform the response to the subject of investigation. The process may include reviewing documents, obtaining different forms of evidence, interviewing witnesses or the victim and interviewing the subject of investigation. Investigations should be conducted quickly, fairly, transparently, consistently and in a manner that provides effective protection for the survivor whilst also protecting the rights of the person accused. While each investigation is unique, and may require different amounts of time, it is important to carry out investigations and complete them as fast as possible. This will ensure that innocent individuals will be cleared as soon as possible and that further misconduct will be prevented.

When there are allegations of criminal conduct then it is the immediate responsibility of Fratelli to report to the appropriate national or governmental agency; the organization will not conduct or continue an investigation (for instance, if there is alarming evidence of an employee producing child pornography; emerging evidence of sexually grooming children; or conduct of criminal offenses such as illicit drug dealing...)

Internal investigation committee:

An investigation committee should convene to explore allegations against staff members when the accusation is serious enough to warrant such an investigation. The aim of the process is to examine accusations and to identify the most appropriate response.

Composition:

The investigation committee should be pre-defined by the organization and would ideally be composed of the following:

- Manager
- Safeguarding Focal Point
- A member of the board of directors (when necessary)
- A legal advisor (when necessary)

It is preferable to have a small number of people (e.g. 3-5) in the committee to improve coordination, to improve efficiency and to limit the risk of spreading information about the investigation. Other actors can be consulted at specific stages of the investigation.

Responsibilities:

The person(s) conducting the investigation should:

- Identify potential bias and conflict of interest prior to the investigation
- Ensure fair, consistent and professional interactions with all participants
- Ensure that fairness is strictly applied throughout the investigation
- Adhere to a sound investigation process
- Document all steps taken in an appropriate manner
- Limit the investigation to relevant facts and avoid pursuing irrelevant background information
- Maintain sensitivity to the emotions of interviewees or persons involved in the investigation
- Accommodate to special needs such as language barriers or illness
- Refuse ‘off the record’ conversations

To explicitly define the roles and responsibilities of the investigation committee, the organization is encouraged to create “Terms of Reference (ToR)” to be signed by all members of the committee.

Lead Investigation Officer:

A person should be nominated to be the lead/main investigating officer that will lead the committee and maintain its conduct. This person is expected to abide by the responsibilities outlined above and, most importantly, to ensure that the investigation is organized, fair, transparent and consistent. This includes ensuring that the members of the investigation do not have a conflict of interest and are not involved in the actual allegation.

Investigation Process

1. Preparation:

The internal investigation committee will identify the lead investigating officer, allegation(s) and person(s) to interview. At this stage, it is important outline the investigation process.

2. Gathering evidence:

The investigator(s) will gather all available information and evidence including: the initial report and any other available information (camera footage, photographs, security records etc.).

Preliminary assessment: threat of harm

An initial assessment should be done by this stage to determine if there is an ongoing threat of harm. If the person under investigation poses a risk of harm to other employees, beneficiaries or the public then steps should be taken to prevent this. For instance, if a person that has regular contact with children is being accused of inappropriate behavior with children then the organization may choose to temporarily reassign the person or suspend them pending the findings of the investigation. In contrast, if the accusation is based on an action in the past and it is unlikely that the accused will pose any harm to others then it may be unnecessary to intervene. In both cases, the nature and severity of the accusation should be used to clearly justify a preventive action by the school.

3. Conducting interviews:

The investigator(s) will meet with concerned individuals including: the reporter, the subject of investigation, the victim, the victim's parents (when applicable) and any relevant witnesses. Investigators should always be mindful of the "do no harm" principle, therefore should not set meetings with individuals if it is deemed unsafe.

General guidelines for interviews:

- Interviews should be carried out as soon as possible
- A familiar venue and suitable time should be selected to reduce stress
- Each person should be interviewed individually
- At the start of an interview, a general explanation of the purpose of the investigation should be provided
- At the start of the interview, highlight to all parties that the discussion are all confidential
- Intimidation techniques are not acceptable during an interview, rather, individuals must be encouraged to express themselves openly

- At the end of the interview, the interviewee should be informed of the next steps and what is expected of them – if anything

Involving children in investigations:

- The parents of the child should be informed of: incidents that resulted in harm to their child, when the child is needed for an interview, the investigation process and its result
- A social worker or psychologist should be present for support during interviews with children, for support ; the professional should brief and debrief the child
- Approval should be obtained from parents before meeting with the child
- If the child is below 15 years old, the parents should be present during the interview
- If the child is 15 years old or above, they can be escorted by their parents to the interview venue but should be interviewed alone
- If it is necessary for a child to come face to face with the accused faculty/staff member in the context of the investigation, the child should be briefed by a professional

Guidelines for asking questions:

As a general guideline, questions should be open-ended and should not be leading. Some examples of questions include:

- What happened?
- Who was the alleged harasser/perpetrator?
- Where did the incident occur?
- When did the incident occur?
- Can you identify any witnesses?
- Was the incident limited to one instance or was it recurrent nature?
- How did the child react?
- Did the reporter discuss or report the incident to anyone else?

Documentation

As much as possible, investigators should document everything including the general process followed, meetings, interviews and conversations. Clear documentation will protect the school and the investigation in case of scrutiny or legal escalation as it justifies the school's responses. Certain steps will be taken to ensure confidentiality. (*See the section on confidentiality below*).

4. Evaluating evidence:

Once interviews have been concluded, witness credibility is assessed and evidence is evaluated. Consideration needs to be given to:

- The integrity of the evidence collected
- Whose version of events makes the most sense
- Whose version is corroborated by other evidence

5. Writing a Report

After the investigation is completed, it is highly recommend that the investigator(s) write a report. It should be comprehensive and sufficiently detailed to enable decisions to be made with regards to the employee. The report will enhance transparency, demonstrate and protect the organization in case of any legal escalation. The written report should include sections on the:

- Context of investigation
- Process of investigation
- Allegations investigated and evidence gathered
- Analysis of evidence
- Relevant conclusions

6. Determining next steps:

Based on the findings, the final report, the investigation committee should determine an appropriate response to the allegation. If the Director is not part of the committee, then the committee may suggest actions to be taken and forward the final report for a decision to be made. The administration may decide to apply internal disciplinary proceedings, refer to authorities or refer the child to child protection organization. Possible disciplinary responses may include: mandatory psychological support, suspension, demotion, reassignment and dismissal.

Further Considerations

Confidentiality

The entirety of the investigation should be kept confidential starting with when the report is received. Confidentiality means that participants should not speak about the investigation to other staff, including other witnesses involved in the matter. The fact that an investigation is underway, its subject, the processes followed, the materials gathered and, especially, the results of the investigation must always be treated confidentially.

Failing to ensure confidentiality can lead to:

- Damage to an individual's reputation especially when innocent
- Damage to the organization's reputation and negative publicity
- Cover up of evidence by the accused that can hinder investigation

If any person involved in the investigation is found to have leaked information and breached the condition of confidentiality then there should be disciplinary repercussions.

Data Storage:

Documents relating to an investigation must be retained, in a secure place, by the school together with a written record of the outcome of the investigation and, where disciplinary action has been taken, retained on the member of staff's, or child's, personal and confidential file in accordance with the school's disciplinary procedures. Anything documented must be stored securely in a password-protected folder on a password-protected computer. Anything printed must be stored securely in a folder placed in a locked drawer with limited access.

Protecting reporters

Those who report possible or actual misconduct and those who cooperate in an investigation must be protected from retaliation. An employee will only provide information if they believe that they will not be penalized for doing so. Those participating in investigations should take all steps necessary to protect whistle-blowers and those who cooperate in the investigation.

Support for individuals under investigation

Being under investigation can be very stressful. To limit the negative effects on individuals under investigation, investigators should:

- Inform them of concerns or allegations as soon as possible
- Provide an explanation of the likely course of action
- Provide them with clear explanations as to the process
- Explain confidentiality and steps being taken to maintain it

Suspending the subject of investigations:

The Director in consultation with the SFP will determine whether or not the employee should be suspended during the investigation according to, but not limited to the following reasons:

- Seriousness of the alleged misconduct
- Likelihood of the employee interfering with the investigation
- Potential of employee's presence in the workplace causing harm to himself/herself or to other employees, beneficiaries or organization

Suspension is not in itself a disciplinary sanction though it should not be undertaken without good reason. Suspension may be considered at any stage of an investigation.

Communicating with parents

The parents of a child who has is involved in an allegation should be made aware of the allegation as soon as possible. The Director, with the support of the SFP and investigation committee, can outline (briefly) to parents what the incident being investigated is, how the school is responding to it i.e. investigation procedure, reassure parents that their child is at no risk and highlight the importance of maintaining confidentiality at the early stages of the investigation. If the child will be asked to be interviewed, the parents should be also be made aware of this; parents can only be present with the child during the interview if the child is below 15 years of age. Parents should also be kept informed about the progress of the case, without any details, and told the final outcome.

In cases where a child has suffered an injury or any harm, parents will need to be notified immediately.

Communicating with the community after an incident

When an incident occurs at the school, the reputation of the school can become compromised due to negative publicity. How an organization reacts to such incidents is critical. The school is advised to consult with counsel to determine what message they want to convey and highlight any limitations on the school's commentary.

In general, a statement should contain: a brief description of the event (without divulging the identities of the concerned persons), the actions the school took and a reassurance that there is no current risk to children at the school. The school should highlight that it acted quickly and transparently using its policies and procedures including the child protection policy.

References

ACAS (Advisory, Conciliation and Arbitration Service). *Guidance: Conducting Workplace investigations*.

http://www.acas.org.uk/media/pdf/q/0/Conducting_Workplace_Investigations_Nov.pdf

BC Human Rights Coalition. *Conducting Internal Investigations*.
<https://d3n8a8pro7vhm.cloudfront.net/clatest/pages/223/attachments/original/1427236373/InternalInvestigation.pdf?1427236373>

Corporate Compliance. *Guide to Conducting Workplace Investigations*. [http://www.corporatecompliance.org/Portals/1/Users/169/29/60329/Workplace Investigations Guide.pdf](http://www.corporatecompliance.org/Portals/1/Users/169/29/60329/Workplace%20Investigations%20Guide.pdf).

ICMEC (International Center for Missing & Exploited Children). *Incident Response*. <https://www.icmec.org/education-portal/incident-response/>

Royal Commission into Institutional Responses to Child Sexual Abuse. *Catholic Education Diocese of Cairns Employee misconduct and investigation processes*. <https://www.childabuseroyalcommission.gov.au/sites/default/files/CTJH.180.90001.0083.pdf>

Investigation tool templates:

ACAS (Advisory, Conciliation and Arbitration Service). *Carrying out investigations in the workplace*. <http://www.acas.org.uk/index.aspx?articleid=5507>

Annex 12: Required recruitment checks

The CPO is responsible of sharing the below with the HR or persons responsible of recruitment of new staff.

1. Advertisements:

Mention in job advertisements that organization has a Safeguarding Policy:

- In advertisement: Explicit mention of the Safeguarding policy at organization
- In job description: Explicit mention that candidates will be expected to comply with organization's Safeguarding policy.

2. Prior to the first interview:

- Provide a copy of the Safeguarding policy or link the candidate to the policy on the website
- Pay attention to long or sudden gaps in the individual's working history, and question the reason behind the gap in the interview
- Make sure HR personnel and leadership involved in interviewing are fully briefed on the Safeguarding policy

3. During the interview:

- Ask candidate to present the required documents and original certificates
- Question the candidate's:
 - Motivation for working with children or vulnerable adults (Depending on position)
 - Work history especially reasons for leaving past organizations
 - Reasons for having working history gaps (if any)
 - Response to a suggested Safeguarding violation scenario
 - Involvement in any previous crimes specifically related to children and vulnerable adults.
 - Understanding of the organization's Safeguarding policy
- Ask challenging questions that can reveal the person's ethic and behaviors:
 - Have you worked at an organization with a Safeguarding policy before? What is your opinion on child protection policies in general?
 - Did you get the chance to read our Safeguarding policy and what do you think of it?
 - How would it be appropriate to comfort a child? In which situations is this permissible?
 - Were you ever in a situation where you had to use physical force with someone?

- Inform candidate that his/her acceptance is contingent on passing a background check which involves contacting their references, receiving a statement from their past employer and requesting a criminal record.
- End the interview on a positive note!

4. Conditional offer:

- Remind the candidate that they must accept and commit to the Safeguarding policy by explicitly signing a summary document along with a code of conduct and relevant HR documents.

5. Background Checks:

- Should a felon account or suspicion report show up in this background check, the related individual can no longer be considered for recruitment
- Request a national judicial/criminal record obtained from the ISF for the individual applying to any position within the organization:
- If the individual is a foreign hire, then they must produce an up-to-date [no older than 6 months] criminal record from their last country of residence **and** from their home country as well when possible.
- Request a statement from the candidate's previous employer saying that, to the employer's knowledge, the candidate was not involved in any inappropriate behavior while employed especially with children.
- Require at least two references for the individual's application. These references need to be checked for validity (to make sure they are real, and the contact information is valid)
- References should always be contacted
- References should never be a family member of the applicant or, in a close relationship with the individual

6. Employment:

- Ensure that all the documents requested have been received and that the background checks (criminal record and reference checks) have been completed.
- Implement an induction that has time dedicated to explain the Safeguarding policy
- Ensure that the candidate is registered to receive a training on Safeguarding.

7. Employee File:

- Store all relevant information securely in a locked cabinet (if hard copy) or a password-protected secure computer (if soft copy) in a room with limited access.

Annex 13: Code of conduct for sub-recipients and suppliers⁵

This Code of Conduct applies to all Fratelli’s suppliers and sub-recipients and their affiliates.

The subrecipient or supplier must adopt and comply with Fratelli’s Safeguarding policy or an equivalent policy.

The subrecipient or supplier must immediately report to Fratelli’s Safeguarding Focal Point any credible:

- a) allegations involving abuse and/or exploitation—including trafficking of persons, forced or child labor—that relate to programming or staff funded by Fratelli.
- b) allegations that are not directly related to programming or staff funded by Fratelli but could be expected to impact the relationship between the subrecipient and Fratelli or the reputation of the subrecipient.

Following the reporting of an alleged safeguarding violation, the subrecipient or supplier will fully cooperate with Fratelli to undertake any investigative or corrective actions Fratelli deems appropriate.

Failure to comply with this provision may result in termination of this Agreement without penalty to Fratelli.

Acknowledgment

I hereby confirm my acceptance of the terms and conditions of Fratelli’s Code of Conduct for Suppliers and sub-recipients; I agree to fully comply with all its principles.

Supplier/sub-recipient:

Address:

Signature:

Date:

Contact information of relevant organizations

⁵ Source: CRS template for sub-recipient code of conduct.

Informing:

Ministry of Social Affairs (MoSA) **01/ 429 384**

Himaya, (Beirut & Mount Lebanon Office) **79/ 300412 – 03/ 414964**

Save the children **81/984262 – 01/ 614680**

Intersos **71/ 172653**

Reporting:

Union for the protection of juveniles in Lebanon (UPEL) **03/ 784 265 - 01/ 427 973**

Judicial Authority: General Prosecutor for child protection issues, (Mount Lebanon)
70/ 243 435

