

**Policy for the Prevention of Sexual Exploitation and Abuse and for the
Protection of Children and Vulnerable Persons¹
Carpathian Foundation-Hungary**

- 2025-

I. Introduction:

The mission of Carpathian Foundation-Hungary is **to improve the quality of life of the people living in the Carpathian region, to preserve the social, ethnic, cultural and environmental values of the region and to promote its sustainable development.**

Carpathian Foundation Hungary implements a number of programmes to contribute to improving the quality of life of people living in poverty, with a special focus on children and young people in marginalised situations and vulnerable adults. Among these goals, a particular focus is placed on improving the quality of life of Roma communities.

Since its establishment, the Foundation has fostered fair and equitable partnerships with its donors, supporters, initiators and grantees, based on mutual respect and appreciation. The Foundation has a responsibility to promote the well-being of children and young people and vulnerable adults or disadvantaged groups in society and will do its utmost to protect them from abuse and sexual exploitation and abuse. We are fully committed to working in a way that protects these vulnerable individuals and groups.

The purpose of this policy is to protect children and vulnerable persons who are partners of the Foundation, users of its services (beneficiaries, grantees, or participants in events, activities or programmes organised by the Foundation). The other main purpose of the policy is to provide guidance to the Foundation's members, staff, experts, volunteers, trainees and fellows on how to act to ensure the safety of children and vulnerable individuals and what to do if they experience any abuse.

This Policy is an essential guideline for the Foundation and all staff, members of the Board of Trustees and the Supervisory Board, experts, trainees, volunteers and fellows, as well as all other actors in other contractual relations with the Foundation, must be familiar with it and accept its contents as binding on themselves.

We share this policy with our grantees and partners, who are encouraged to develop their own similar policies and procedures to ensure the safety, well-being and protection of children and vulnerable adults in their care.

In the case of our grant programmes where the direct or indirect target group or beneficiaries are children and vulnerable persons, the grantee organisations must either:(1) develop a similar policy; (2) follow the guidelines and rules of the Carpathian Foundation's Protection Policy (in which case they must either make this commitment as a clause of their grant agreement or provide a written statement with the same effect in a separate declaration).

¹ In summary, the document will be hereafter referred to as the Protection Policy.

This policy should be read and interpreted in conjunction with the **Foundation's Code of Ethics** and its **Rules of Organisation and Operation** and the **UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse** (ST/SGB/2003/13 <https://www.unhcr.org/media/secretary-generals-bulletin-special-measures-protection-sexual-exploitation-and-sexual-abuse> and their procedures).

This policy is publicly available on the Foundation's website.

This Child Protection Policy complies with the following legislation:
Act XXXI of 1997 (Hungarian Child Protection Act):

Rights of the child

- 6. § (1)* A child has the right to be raised in their own family environment ensuring their physical, intellectual, emotional and moral development, healthy upbringing and well-being.**
- (2) A child has the right to receive assistance in being raised in their own family, developing their personality, averting any situation which jeopardises their development, being integrated into society and creating an independent way of life.**
- (2a)* Disadvantaged children and children with multiple disadvantages have the right to increased assistance in overcoming circumstances hindering their development and in improving their opportunities.**
- (3) Disabled and chronically ill children have the right to special care to help their general and personal development.**
- (4) A child has the right to be protected against environmental and social effects harmful to their development and against substances harmful to their health.**
- (5)* A child has the right to respect for their human dignity, to protection against abuse – whether physical, sexual or psychological violence – neglect and informational harm. A child shall not be subjected to torture, corporal punishment or other cruel, inhuman or degrading punishment or treatment.**
- (5a)* A child has the right to be protected by professionals acting with the aim of recognising and eradicating child abuse, in particular by applying standard principles and methodologies.**
- 5 n)* vulnerability: a condition resulting from an activity, a failure to act or a circumstance, whether by the child or by another person, that inhibits or impedes the child's physical, intellectual, emotional or moral development.**

II. Key principles:

We live and work according to humanitarian principles:

Humanity: Human suffering must be addressed everywhere, especially considering the most vulnerable populations.

Neutrality: Humanitarian aid must not favour any party in an armed conflict or other dispute.

Impartiality: Humanitarian aid should be provided on the basis of need only, without discrimination.

Independence: The independence of humanitarian objectives from political, economic, military or other objectives.

This policy is based on the following key principles:

- All children and vulnerable adults have equal rights to protection, well-being and participation.
- We have a zero tolerance policy towards all forms of harm and abuse of children, young people and vulnerable adults.
- We follow high ethical standards, transparency and openness in our activities and in the application of our protection guidelines.
- All our employees and parties concerned (especially children and vulnerable adults) are given appropriate support to protect themselves.
- We believe that all of our employees, volunteers and partners have an individual responsibility to comply with and follow the protection guidelines (specifically, that they have a responsibility to recognise when it is necessary to act on any suspicions, even to prevent or deter abuse, and to report suspicions or concerns immediately to the designated person).

Purpose of the Policy:

- To ensure the safety of children, young people and vulnerable adults involved in the Foundation's programmes and projects;
- to ensure a safe and secure environment for children, young people and vulnerable adults participating in the Foundation's events, activities and programmes, in accordance with the law;
- to demonstrate the Foundation's commitment to the protection of children and vulnerable adults;
- to provide access for all staff to the information needed to fulfil their duties and responsibilities in relation to compliance with the security guidelines;
- to establish a guide setting out appropriate procedures and rules of conduct along the lines of the protection guidelines and to establish an appropriate reporting system to ensure that those involved in the Foundation's programmes are heard when necessary;
- to ensure that new information is professionally and securely recorded, collected and stored, and that the protection policy is widely shared with all the concerned parties of the Foundation (children, their families, staff, volunteers, etc.)

This policy is designed to support all Foundation staff, volunteers, trainees, grantees and other partners in their duty to protect children and vulnerable people from abuse and vulnerability.

Our aim is to create a clear, universally understood operational framework and rules that can help prevent or avoid these unwanted incidents.

This policy is binding on all Foundation staff, volunteers, board members and contractors who are commissioned by the Foundation to provide services to its clients, assisted target groups, i.e. individuals, families or children.

We are committed to reviewing this policy regularly.

III. Key definitions, including the main types of abuse

Child abuse as defined by the WHO: "Child abuse and neglect (maltreatment) includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other

exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power."

The abuse of vulnerable persons can be understood as be the physical, mental, emotional, financial or sexual abuse or neglect of another person. This abuse can be one-off or repeated, and even several forms of abuse can be observed and detected at the same time. Failure to take appropriate measures, negligence or neglect may also constitute abuse or endangerment.

Child

A child is anyone who is under 18. (This definition is in line with the United Nations (UN) Convention on the Rights of the Child.)

Vulnerable person, adult

A vulnerable adult is a person aged 18 or over who is disadvantaged in relation to others, or who is unable to care for or protect him/herself (from exploitation or abuse) due to a mental or other disability, age, illness, socio-economic disadvantage (e.g. low educational attainment, poverty, poor housing, lack of regular income) or ethnicity, nationality, religion or sex. *For the purposes of this policy, the Foundation's clients and partners (such as refugees) are always considered vulnerable persons and adults and are referred to as such.*

Abuse

There are four main categories of (child) abuse: neglect, physical abuse, psychological/emotional abuse and sexual abuse. (But there are also many other forms of threats, abuse and violence, such as online abuse, bullying, financial abuse, indirect abuse, isolation (social abuse), etc.) These forms of abuse and maltreatment are usually seen together and are often not easily recognisable.

1. Neglect

Neglect, which is also abuse, deprives the child of the needs that would promote his or her physical, emotional and social development, so the child may suffer harm when the abuse is committed and unfortunately in most cases there are long term consequences.

2. Physical abuse

Physical abuse involves causing physical injury, harm or pain to the child. Failure to hinder or prevent physical injury is also abuse.

3. Psychological/emotional abuse

The actual or perceived adverse effect on a child's emotional and behavioural development caused by persistent or severe emotional abuse or rejection.

Emotional abuse, which is a form of abuse that is difficult to uncover, can cause serious damage to a child's personality development. Emotional abuse includes humiliation, constant criticism, ignoring the child, suggesting worthlessness or threatening to punish, or holding the child in fear.

4. Sexual violence

Actual or suspected sexual exploitation of children. This includes sexual abuse, incest and all forms of sexual activity, including pornography. This includes the commission of a sexual act on a child or forcing a child to perform such an act; in addition to sexual acts, the act of seduction, indecent assault, sexual activity in front of a child, watching pornographic films or magazines with a child.

Based on the above definitions, it is clear that abuse can be caused by both actions and omissions and can take place both inside and outside the family.

Different forms of abuse and mistreatment can be observed together and in complex ways. See Annex 2 for how to recognise the signs of abuse.

Other definitions of particular importance:

5. Sexual exploitation:

Actual or attempted abuse of a vulnerable position for sexual purposes through power imbalance or trust. This includes, but is not limited to, financial, social or political gain from the sexual exploitation of another person.

6. Sexual assault:

Sexual assault is defined as the actual violation or threat of violation of a person's physical integrity of a sexual nature, whether by force, in unequal power relations or coercive circumstances.

Guidelines for the protection of children and vulnerable adults

Protection guidelines consist of a broad set of philosophy, rules, policies, standards, guidelines and procedures designed to protect children and vulnerable persons and adults from intentional and unintentional harm. In the present context, these guidelines embody the personal obligations of the Carpathian Foundation-Hungary as an organisation and of all persons in a contractual relationship with the Foundation.

IV. Code of Conduct

The following is the code of conduct for the Foundation's staff, trustees, supervisory board members, trainees and volunteers. Acceptance of and compliance with the Code of Conduct and the Protection Policy is mandatory for all members, staff, volunteers, trainees and partners of the Foundation, and their breach implies consequences (dismissal, suspension, etc.).

1. It is of the utmost importance that all members, staff, volunteers and other employees in connection with children and vulnerable adults:
 - are on the one hand aware of the situations that may pose a risk and on the other hand how those situations can be managed;
 - plan and organise the location and content of sessions appropriately in order to minimise any possible risks;
 - remain visible when working with children;

- create and maintain an environment of a partnership based on equality, where the child and vulnerable adult can be open and where all their questions and concerns can be raised and discussed;
- create an atmosphere of shared responsibility in which abuse is less possible to occur,
- respect each child's boundaries and help them understand their rights and what they can do if they feel that they or their peers are being abused, mistreated or endangered.

2. THE FOLLOWING IS PROHIBITED UNDER ANY CIRCUMSTANCES for staff, trainees and volunteers (unless they are parents, family members or guardians of the concerned parties):

- Spending an unreasonable amount of time alone with a child or vulnerable adult.
- Inviting children or vulnerable adults into their own homes, especially to a place where they can remain alone with them.
- Co-sleeping (in the same bed or room) with a child, children or vulnerable adults without supervision or other adults (staff).

3. THE FOLLOWING IS PROHIBITED UNDER ANY CIRCUMSTANCES for staff, trainees and volunteers:

- Entering into sexual relations with beneficiaries of the Foundation, especially children or vulnerable adults.
- Developing an emotionally based relationship with children or vulnerable adults that could be considered exploitative or abusive in any way.
- Engaging in negligent or reckless conduct or behaviour that may create a situation of endangerment or abuse.
- Intentional conduct that may create a situation of endangerment or abuse.

4. THE FOLLOWING IS PROHIBITED UNDER ANY CIRCUMSTANCES for staff, trainees and volunteers:

- Using language, making suggestions or giving advice that is offensive or abusive.
- Engaging in behaviour that is inappropriate or sexually provocative towards a child or vulnerable adult.
- Engaging in conduct that is unlawful, abusive or may endanger children or vulnerable adults.
- Conduct in which the perpetrator seeks to cause, or is likely to cause, embarrassment or humiliation to the target person.

5. Sexual exploitation and sexual abuse

IS PROHIBITED UNDER ANY CIRCUMSTANCES

5.1 Sexual exploitation and sexual abuse violate universally recognised international legal norms and standards. The Carpathian Foundation has a zero tolerance policy towards its staff and partners in this regard.

5.2 In order to protect the most vulnerable groups, in particular women and children, we will emphasise and reinforce the following in our policy:

- (a) Sexual exploitation and sexual abuse constitute serious misconduct. This will result in disciplinary action, including immediate dismissal;
- (b) Sexual activity with children (persons under 18) is prohibited. Regardless of the local age of majority or age of consent. A mistaken belief about age does not constitute a defence;
- (c) The exchange of money, labour, goods or services for sexual services, including sexual favours or other forms of humiliating, degrading or exploitative conduct is strictly prohibited.
- (d) Sexual relations between the staff, volunteers, partners and clients and beneficiaries of the Carpathian Foundation are prohibited. Because they are inherently based on unequal power dynamics, they undermine the credibility and integrity of the Carpathian Foundation's work;
- (e) If a member of the Carpathian Foundation staff² has a concern or suspicion of sexual exploitation or sexual abuse, that person must report such concerns through the established reporting mechanisms, as described in Articles V and VI;

5.3 Binding: The staff of the Carpathian Foundation is obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. And management at all levels has a responsibility to support and develop the systems that maintain this.

V. Liability and protection management

In general, all adults must take responsibility for the children and adults with whom they work. Any person (staff member, volunteer, trainee, fellow, trustee, other contractor, etc.) who suspects that a child or vulnerable adult has been abused or is at risk of abuse must report it to the **Designated Protection Officer** (the Foundation Director) or the Deputy Protection Officer (the Chairperson of the Board of Trustees) if the Chief Executive is unavailable or involved.

The Designated Protection Officer is therefore the Foundation's Executive Director, who is replaced by the Chairperson of the Board of Trustees in their absence or if they are involved.

The Designated Protection Officer is the person to whom a referral may be made, as necessary, in the event that a staff member, volunteer, parent or other cooperating or concerned person becomes aware of a problem or concern about the safety and well-being of a child or vulnerable adult.

The Designated Protection Officer and the Deputy Protection Officer can be contacted through the following channels:

In person: Boglárka Bata, Protection Officer, 3300 Eger, Felvégi út 53.

By e-mail to: boglarka.bata@cfoundation.org

Over the phone: +36-36-516-750

² Hereinafter, staff refers to all members, employees, experts, volunteers, trainees and other persons in a contractual relationship with the Carpathian Foundation.

Reports can be made in Hungarian, English or any other language in the specific situation (we can have it translated)

In person: Sándor Köles, Deputy Protection Officer, 3300 Eger, Felvégi út 53.

By e-mail to: sandor.koles@cfoundation.org

Over the phone: +36-36-516-750

The Designated Protection Officer is responsible for:

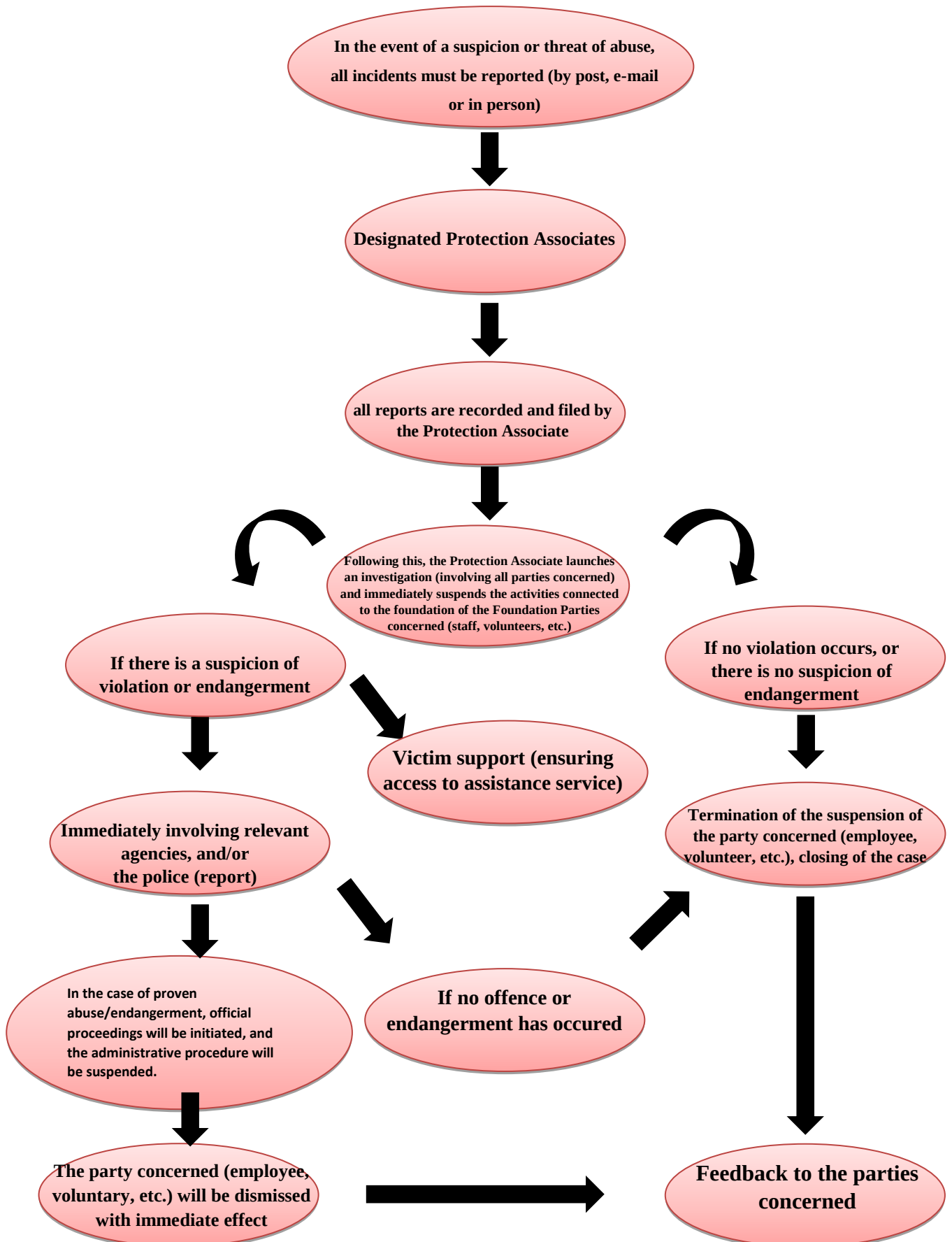
- ensuring that all partners, beneficiaries and concerned parties of the Foundation are informed of the Foundation's Protection Policy and adopt similar policies in their own operations;
- that the Foundation's staff and all its partners, beneficiaries and stakeholders are informed of the protection policy and are reminded to behave accordingly;
- recording all reports of suspected abuse;
- investigating cases and, if necessary, involve all concerned parties, including parents, authorities, police, etc;
- removing or terminating the contract of any member, staff member, volunteer, trainee or other person under contract who has committed an act of abuse or endangerment;
- ensuring that employees and volunteers who report alleged misconduct or participate in investigations are protected from retaliation.
 - implementing safety measures to prevent possible abuse when recruiting and hiring new staff and volunteers; ensuring that all staff, volunteers, trainees and members are aware of these guidelines and are provided with training on them.
 - The Protection Officer is responsible for taking appropriate action in cases where there are reasonable grounds to believe that any of the rules, standards or any form of conduct has been violated, or a criminal offence has been committed. This measure shall be taken in accordance with the rules laid down. All reports of sexual offences, sexual exploitation and sexual abuse must be treated confidentially to protect the rights of all parties concerned.

The Designated Protection Officer ensures that:

- the rules and procedures set out here enforced, supports members, staff, volunteers, trainees, etc. in reporting any suspected or actual cases of abuse to the relevant authorities or police;
- these rules are periodically (but at least annually) reviewed for legal compliance and consistency with the Foundation's operations and other rules (anyone may initiate a review of the rules with the Executive Director if they deem it necessary);
- this policy is applied properly (by monitoring and evaluating compliance at least every three years) and that it is adapted to the needs and circumstances that arise.

The Chairperson of the Board of Trustees is actively involved in the monitoring and annual review of this policy; and, as with all the Foundation's policies, the Supervisory Board reviews the policy annually and, taking into account the recommendations of the Supervisory Board, the Board of Trustees approves it annually.

Figure 1: Flowchart
on the Foundation's procedure to be followed in the event of abuse, endangerment or threat thereof



Specific obligations relating to the media

The rights and dignity of children and vulnerable adults must be respected at all times, in all circumstances, and the best interests of children and vulnerable adults must be at the centre of all communications.

Only photographs and videos for which the participating children and their parents and/or vulnerable adults have provided their written consent may be used by the Foundation for marketing, PR and fundraising purposes.

The Foundation may only publish purchased photographs for which it has confirmed the above (written permission from the parties concerned).

It is important to emphasise that all photographs and videos used by the Foundation must depict children and vulnerable adults in a way that does not show them in a vulnerable position or depicts them in a way that does not violate their dignity.

The Foundation also pays special attention to these principles and rules in cases where professional photographers or representatives of the media and press take photographs of the Foundation's beneficiaries at its events. In such cases, we ensure that:

- these professionals are familiar with and are required to comply with these protection guidelines and the obligations contained in this policy;
- photographers and videographers are not left alone and unsupervised with the Foundation's beneficiaries, children and vulnerable adults;
- children and parents must be informed of the purposes for which their photographs and images will be used and their consent must be obtained;
- in order to protect the privacy of children, the Foundation must be informed on how their records and photographs will be used.

The Foundation reserves the right at any time to refuse to allow the press, media or other contracted service providers to use any photographs and/or footage taken if it is concerned that they do not comply with this protection policy.

VI. Recruiting and hiring staff, volunteers and trainees

The aim of this chapter is to ensure that the Carpathian Foundation guarantees the prevention of sexual exploitation and abuse and all forms of abuse, and to take steps to this end, consistently and systematically addressing appropriate human resource management and organisational processes. These principles are integrated into the entire human resources management process (selection, recruitment, working, monitoring, performance appraisal, exit).

At the Carpathian Foundation, we are committed to protecting children and vulnerable adults. The organisation's Protection Policy includes systematic screening and selection criteria for candidates through appropriate screening. This is reflected in our job advertisements, interview questions and

includes reference checks, exclusion of misconduct and a binding declaration by the candidate confirming that they have never been subjected to sanctions (disciplinary, administrative or criminal) in this respect.

All our job advertisements include a reference to the prohibition of sexual abuse, exploitation and assault. (see Annex 3). Reference checks with previous employers are a mandatory part of the recruitment process. It is mandatory to ask for a certificate of good conduct from applicants. All employment contracts/service contract templates comply with PSEA principles. We publish on our website our commitment to protection measures (including the prevention of sexual exploitation and abuse) when publishing each job advertisement.

Recruitment, job descriptions and selection process

The specific roles and responsibilities arising from the different posts should be duly indicated.

When recruiting for positions that involve significant responsibility in working with children and/or particularly vulnerable adults (e.g. social, mental health workers), we need to ensure that we take a more rigorous approach to the selection and pre-screening of candidates. For example, attention should be drawn to the following: **"In this position, you will have direct contact with children and vulnerable adults, therefore increased control is required during pre-screening"**.

In recruiting and selecting staff, volunteers and trainees, the Foundation pays particular attention to the proper screening of applicants in order to effectively reduce the risk of abuse of children and vulnerable adults.

New employees, volunteers, trainees

To reduce risks, the Foundation will take the following security measures when this policy comes into force:

- when advertising a new position, we will publish a notice that applicants must be aware of and comply with the requirements of the Code of Conduct (a link to the Code will be included in the job advertisement);
- We ask for a certificate of good conduct (no criminal record) and two written references when applying. In the latter case, references can be provided by previous employers (or teachers, mentors), which can prove that the candidate has not had any problematic behaviour or incidents with the target groups in question in the past;
- during interviews, we go through the policy with candidates and ask specific (but non-discriminatory) questions to see if they comply with its contents.

The Carpathian Foundation has a zero tolerance policy towards the sexual exploitation and abuse of children and adults. In the selection process, the Foundation uses a range of procedures and measures, including references and the certificate of good conduct, to better protect children and vulnerable adults and prevent abuse.

The Carpathian Foundation has a strong child protection policy and a zero tolerance policy towards sexual abuse, exploitation and abuse in all settings.

Gender equality commitments:

- the Carpathian Foundation provides an environment that promotes the equal assessment of women and men and provides equal access to information.
- It also provides a working environment where women and men are evaluated and promoted solely on the basis of their skills and performance.
- the Carpathian Foundation respects its beneficiaries - women, men, children (boys and girls) - equally, regardless of their gender, sexual orientation, disability, religion, race, colour, origin, nationality, age or marital status.
- the Carpathian Foundation respects and values all cultures.

VII. Raising awareness and training

After the approval of the policy, and upon entry, all current staff, contract volunteers and trainees are required to read it thoroughly and the Executive Director is required to organise a meeting with them to discuss their correct and common understanding of the policy. Each of them must sign a declaration acknowledging that they are aware of the importance of this policy and will carry out their work accordingly.

Before starting work, all new employees, contractors, volunteers and trainees are required to read this policy carefully and then agree in a declaration (attached to their employment contract or voluntary contract) that they will act in accordance with it in the course of their work.

Staff will also receive a refresher training course immediately after the approval of the policy (online) and at least once a year thereafter. The training will focus on: principles and practices for preventing sexual exploitation and abuse, the main possible types of abuse, signs, how to recognise it, how to react, what to do, whom to report possible abuse to, etc.

Newly joining staff are required to undertake the following online training on entry, strictly prior to meeting the sensitive groups in person.

Link to the mandatory training:

Summary of the Prevention of Sexual Exploitation and Abuse (PSEA) section ([unicef.org](https://www.unicef.org))

A certificate of completion of the training will be placed in the employee's personal HR folder, proving that the training has been completed.

The Foundation is fully committed to improving the individual knowledge and professionalism of its staff, volunteers, trustees, etc. in order to minimise the risk of abuse and harm to children and vulnerable adults in its operations.

The members of the Board of Trustees and the Supervisory Board acknowledge and accept the provisions of this policy by reviewing them regularly and approving them annually.

VIII. Confidentiality

The Foundation will treat all records relating to children/vulnerable adults as confidential and will only share them with those who inevitably need to know their content and only when it is necessary for ensuring their welfare and protection.

The Foundation will cooperate fully with all relevant authorities, police, child protection services or organisations to ensure that all relevant information is shared in the course of any proceedings, investigations or inquiries.

IX. Reporting, signalling system (process and procedure)

Any person involved in the Foundation's activities (staff, volunteer, trainee, fellow, trustee, contractor, initiate, etc.) who suspects that a child or vulnerable adult is being or is at risk of being abused has a full individual responsibility to share their concerns with the Foundation's Designated Protection Officer. Staff members, volunteers, trainees and fellows, etc. must report any suspicions to the Protection Officer without delay, but at the latest within 24 hours.

The following examples are reasonable causes of concern:

- (a) a report from the child themselves or the person concerned that they are being abused;
- (b) testimony by someone that they have witnessed abuse;
- (c) any illness or injury or behaviour that may indicate abuse;
- (d) a symptom that does not necessarily indicate abuse per se, but which suggests intentional omission or negligence;
- (e) signs of prolonged neglect or negligent behaviour.

The report should be made in writing (by post or e-mail) or verbally (in a face-to-face meeting) to the Protection Officer, i.e. the Executive Director. The Protection Officer shall record all reports in writing, requesting a written statement from the reporting person. (Annex 1: Reporting form). We take all suspicions and signals seriously, act professionally and confidentially, and store reports securely.

The Protection Officer will consider the report, involving all concerned parties, in particular the parents of the children concerned, and record the case within 24 hours in the case of serious endangerment or abuse, or within a maximum of one week in other cases, and inform the competent authorities or police if they deem it necessary.

During the investigation, the parties involved (staff, volunteers, etc.) will be immediately suspended and, in the case of proven risk or abuse, the employee, volunteer, board member, etc. will be immediately dismissed or replaced. All parties involved (including those who reported the incident or suspicion) will be informed about the necessary details related to the case.

If, after due investigation, there is evidence to support the allegations of SEA, these cases can be referred to the national authorities for (criminal) prosecution **with the consent of the victim.**

VI. Specific aspects of sexual exploitation and abuse (SEA) procedures:

1. The use of a victim-focused approach in dealing with SEA allegations:

SEA complaint intake and subsequent investigations follow a "do no harm" approach, including ongoing assessment of the safety and security of those involved at every step of the process.

All SEA allegations are immediately forwarded to the Protection Officer (or the Deputy Protection Officer), who will provide the victim with comprehensive information about available services and possible further steps within a maximum of 48 hours. The counselling should include detailed information on the support services available, as indicated by GBV (gender-based violence) referral pathways, and the organisation's investigation procedures.

The victim should be given sufficient information in a language they understands about their right to confidentiality and its limitations, as well as the need to keep confidential all information about the complaint and the subsequent procedure.

The victim's written consent to the transfer of personal data to service providers is required and can be withdrawn at any time.

The victim should receive a full explanation of the steps of the investigation and understand the consequences, including the rights of the subject of the investigation. The victim must be informed before the subject of the investigation is informed of the complaint or is questioned.

Victims must be offered assistance and protection, regardless of whether they are involved in the investigation. A victim who is under investigation has the right to be accompanied by a confidant for moral support at the hearing.

Victims should be informed of the outcome of the case.

2. SEA investigation standards and procedures:

Confidentiality: information about the investigation and the identity of the individuals involved must be kept confidential to ensure the integrity of the investigation and the privacy of those involved in the investigation. Information on the investigation can only be shared on a "need to know" basis.

Impartiality and objectivity: internal guidelines on the investigation process must be strictly followed to enhance impartiality, transparency and professionalism. Any real or perceived conflict of interest must be declared as soon as possible.

Independence and non-interference: the investigation must be independent of any department of the organisation and free from pressure from other parties.

Competency and integrity: everyone involved in conducting or supervising an SEA investigation must be properly trained - as a minimum, they must have completed the UNHCR e-learning course on investigating allegations of sexual exploitation and abuse, available at www.disasterready.org.

Evidence-based approach: the results of an SEA investigation must be based on evidence, which can be both incriminating and exculpatory. The investigators may draw reasonable conclusions for their decision, but they may not base their conclusions on guesswork or assumptions.

Due process:

Victims' and witnesses' rights: professional, impartial, thorough investigation without undue delay; confidentiality during the investigation and explanation of the process; protection against retaliation; non-disclosure of the identity of the source of the complaint; measures to protect against security risks; assistance of an interpreter if necessary; review of the interview, written record of the interview given by the victim or witness.

Rights of the subject of the investigation: fair notice; information about the nature of the report; professional, impartial, thorough investigation without undue delay; presumption of innocence throughout the investigation until proven otherwise; confidentiality during the investigation and explanation of the process; opportunity to explain the act, to propose relevant witnesses and to present relevant information; scheduling of the interview at a reasonable place and time; possibility to be accompanied at the interview by a confidant for moral support (but legal representation is not allowed); assistance of an interpreter if necessary; review of the written record of their own interview; possibility to comment on the findings of the investigation and to present additional evidence.

The investigator's responsibilities include: conducting an objective, impartial and fair investigation; maintaining the integrity of the investigation; disclosing and addressing any real or suspected conflicts of interest early; maintaining confidentiality and sharing information only "as necessary"; signing confidentiality oaths with those involved; gathering incriminating and exculpatory evidence; balancing the rights of the person under investigation with the protection of the victim; drawing only reasonable inferences and drawing conclusions supported by the investigative findings.

3. SEA complaint reporting process

On receipt of a report of sexual exploitation and abuse, the Protection Officer (or Deputy Protection Officer) should take the following steps.

Acknowledgement of the complaint

All complaints must be acknowledged: if the misconduct is reported orally, the acknowledgement is usually made orally at the same time; whenever possible, the complaint should also be acknowledged in writing.

All reports of possible offences are recorded in a confidential database (accessible by the Protection Officer and their deputy and other assistants involved in the investigation in a password-protected one drive folder) and are given a unique case number.

SEA complaints can be received anonymously and, although they may not be investigated because due process requirements are not met, they are reviewed, recorded and form the basis for necessary mitigation measures.

Preliminary assessment

When conducting the preliminary assessment, the Protection Officer (or the Deputy Protection Officer) should determine:

- a) whether the allegation, if proven true, would constitute misconduct; and
- b) whether there is a reasonable chance that an internal investigation would gather sufficient information to prove or disprove it.

Results of the preliminary assessment

The possible results of the preliminary assessment of the contact person³ are:

- a) The SEA investigation is justified (with the informed consent of the victim);
- b) the case must be transferred to another organisation (the ‘accountable’ organisation) with which the alleged perpetrator has a contractual relationship. The transfer must be made through the accountable organisation’s confidential reporting channels⁴ or, if not known, through senior management;
- c) the SEA investigation is not justified and the case is closed. This only occurs in limited and specific circumstances, for example where the victim does not consent to the investigation or where the complaint is objectively unfounded.

All decisions must be justified and documented in writing.

4. Administrative investigation process for SEA allegations:

Step 1: designing the investigation

The investigator:

Defines the allegation, including when it happened and who was involved (the source of the complaint should never be mentioned, but may be included in the list of potential witnesses).

Identifies the applicable legal standards, including the rules/regulations/standards of conduct that may have been violated by the alleged misconduct and possible disciplinary procedures.

Identifies the person subject to investigation and checks whether there have been previous complaints against the same person.

Prepares an investigation work plan, including measures and timeframes; interviewees; documents and other evidence to be collected.

Assesses the risks of participants and must ensure that appropriate risk mitigation measures are in place.

Step 2: gathering evidence

The investigator can rely on evidence based on witness statements (through interviews with the victim, witnesses and the subject of the investigation) and documentary evidence (both paper and electronic).

³ To whom the complaint is received.

⁴ <https://data.unhcr.org/en/documents/details/104118>

The investigator must gather both incriminating and exculpatory evidence. Evidence can be direct or indirect.

The investigator should conduct the interviews in the following order: source of the complaint, if different from the victim; victim; relevant witnesses proposed by the victim; other relevant witnesses; the person subject to investigation; relevant witnesses proposed by the person subject to investigation. The particular vulnerability of the persons interviewed shall be duly taken into account.

When the assistance of an interpreter is required, in addition to the selection of an interpreter with the most appropriate linguistic skills, the interpreter's ability to maintain neutrality and impartiality and to avoid conflicts of interest should be taken into account.

Step 3: analysis

Once all the evidence has been collected, the investigator should carry out the analysis and credibility assessment according to the following criteria:

Internal consistency:

- Is the story believable and is it objectively possible that the sequence of events happened as described?
- Is the story coherent, or are there contradictions or logical breaks within the testimony?
- Is the story detailed enough to be credible?

External consistency:

- Do other witness testimonies confirm or refute the story?
- Does other types of evidence confirm or refute the story?

The level of proof (the quantity and/or quality of evidence needed to prove the prosecution case) in SEA investigations is usually a measure of probability (more than likely).

Step 4: investigation report

If the offence is confirmed, the investigator will prepare an investigation report.

Before the report is finalised, the findings of the investigation should be shared with the subject of the investigation, who has the right to know and comment on the factual findings. Any comments from the subject of the investigation should also be mentioned in the final report.

The finalised investigation report will be finalised no later than 30 days after receipt of the allegation.

5. Post-investigation

If the offence is not confirmed, a case closure report and a letter of clarification will be issued to the person subject to investigation.

If the offence is confirmed, the victim and the person subject to investigation must be informed in writing of the outcome of the investigation process.

The appropriate administrative/disciplinary measures should be determined. Both parties have the possibility to request a review of the decision if they have new or additional information that was not taken into account during the investigation. Such requests must be submitted to the Board of Trustees within one month.

Informed consent

Ensure that the data subject gives informed consent (including risks and benefits); is competent to decide; and does not consent while being coerced, threatened or promised benefits.

Safety and Protection

If there is a risk to the safety of the person concerned, contact the competent authorities (police - 107 and 112, or security services).

Heves County:

Child Welfare and Day Nurseries Directorate Family and Child Welfare Centre

Address: 3300 Eger, Szvorényi u. 50/A.

Telephone: (36) 785-828, (30) 481-3822

Legal advice :36/785-422

For more support organisations: <https://data.unhcr.org/en/documents/details/93364>

In case you need help, you can find contact details here:

A detailed list can be found here: <https://data.unhcr.org/en/documents/details/93364>

X. Risk management

In order to minimise the risks that may arise, the Foundation carries out risk assessment and risk management before starting its programmes and projects where the target groups concerned are involved and contacted. Risk management involves the identification of key risk factors and possible management plans, followed by their monitoring and evaluation.

The following factors should be taken into account as minimum standards when working with children and vulnerable adults:

- As regards the staff involved: the number of staff, contributors, whether they have experience with the target groups and whether they have been "screened", checked at the time of recruitment, involvement and received training;
- In terms of the needs and circumstances of the target group concerned - their number, age, parental care or companionship, other special needs or disabilities, etc.
- The planned location and time - whether it is safe, suitable for persons with disabilities who may require special attention or accommodations, the number of participants involved, the number of staff involved and the number of other participants;
- With regard to other participants (e.g. media, visitors, etc.) - the number of other participants, their information, their "monitoring";
- Whether or not supervision, monitoring and support is provided for staff and volunteers.

XI. Monitoring and evaluation

The Foundation will regularly monitor the proper application of this policy and its consistency and compatibility with the external circumstances and the legal environment, as well as with its other internal policies and activities.

The Protection Officer/Executive Director is responsible for the annual review of this policy, in particular its proper application (monitoring and evaluating this policy within one year of its approval and at least every three years thereafter) and for amending it as necessary.

The Chairperson of the Board of Trustees is actively involved in this monitoring and evaluation process, which is carried out by the Foundation's Executive Director and, as with all the Foundation's policies, this policy is audited annually by the Supervisory Board and approved annually by the Board of Trustees on the basis of their recommendations.

This policy will be reviewed immediately after each reported incident.

XII. Effective communication

The Carpathian Foundation-Hungary encourages its collaborating partners, grantees, supporters and contracted service providers to develop similar policies and procedures to ensure the safety of the target groups concerned. As a minimum expectation, in donation programmes in which children and/or vulnerable adults or persons are directly or indirectly contacted or involved, the beneficiary organisations must at least accept this policy and acknowledge its binding force (either in a written statement or by signing the grant agreement as one of its clauses).

This policy was approved by the Board of Trustees of the Carpathian Foundation-Hungary in a separate resolution on 10 January 2025.

Resources

The UN definitions of SEA: [UN Secretary General Bulletin on PSEA](#)

Standards of conduct on PSEA: [IASC Six Core Principles](#)

ECPAT International Child Protection Policy

http://www.ecpat.org/wp-content/uploads/legacy/child_protection_policies.pdf

Keeping Children Safe Child Safeguarding Standards

<https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resources/child-safeguarding-standards-and-how-implement>

Child-Safe Organisations Self Study Manual

http://www.ecpat.org/wp-content/uploads/2017/02/02_Child-Safe-Organisation_Self-Study-Manual_eng.pdf

Crèche Cois Laoi's Child and Adult Protection Policy

<https://www.ucc.ie/en/media/support/creche/documents/Child-and-Adult-Protection-Policy.pdf>

Early Childhood Ireland: Child Protection and Welfare Practice Handbook

https://www.earlychildhoodireland.ie/wp-content/uploads/2017/03/CF_WelfarePracticehandbook-1.pdf

National Early Years Children First Committee: DEVELOPING A CHILD PROTECTION & WELFARE POLICY: A RESOURCE FOR EARLY YEARS SERVICES

https://www.earlychildhoodireland.ie/wp-content/uploads/2017/03/Revised_-_Developing_a_Child_Protection_Welfare_Policy_A_Resource_for_Early_Years_Services_.pdf

Haven Community Foundation: Child and Vulnerable Adult Protection Policy

<https://www.havenpartnership.com/wp-content/uploads/Child-Protection-Policy-for-Website.pdf>

ChildHope UK: CHILD PROTECTION POLICIES AND PROCEDURES TOOLKIT

<https://www.unicef.org/violencestudy/pdf/CP%20Manual%20-%20Introduction.pdf>

Annex 1: Reporting form

Details of the incident

The name of the child or adult concerned:	Location and time of the incident:
Name of the reporter:	Reporter's position in the Foundation (volunteer, grantee, etc.):
Details of the suspicion (What, when and where was observed; was the child alone, if not, with whom; what was the nature of the injury or behavior observed; what did the child say; what did you say; witnesses; other adults who were there and what did they say, etc.):	
What happened after that? (Who did what; what possible proposals do they have for the future; what other institutions, authorities are involved, have been involved, etc.):	

Date, place and time:	
Signature of the reporter:	Signature of the Protection Officer:

Annex 2: Possible signs of abuse or endangerment

Recognising the signs of possible abuse and endangerment is extremely complex, there is no single list that allows for easy recognition. However, there are warning signs that can and should be taken into account. Of course, it should not automatically be assumed that abuse or endangerment has occurred. But if such signs are detected, they should be reported to the Designated Protection Officer so that appropriate action can be taken in the event of abuse or endangerment.

Possible signs of physical abuse:

- Bruises, burns, tremors, bites, cuts
- Strange explanations for the origin of injuries
- Refusal or rejection to discuss injuries
- Backing down from touching
- Covering arms and legs in warm weather
- Being wary of participating in physical activity (such as sport), including undressing
- Fear of returning home and parents
- Caution, mistrust of adults
- Self-destructive behaviour
- Aggression towards others
- Passivity and frequent complaints
- Running away (several times).

Possible signs of emotional abuse:

- Physical, cognitive or emotional underdevelopment
- Anxiety
- Late speech or speech disorders
- Fear of new situations
- Lack of confidence
- Incorrect emotional responses to specific situations
- Passivity and/or aggression
- Drug or alcohol addiction, excessive consumption
- Running away (several times)
- Kleptomania.

Possible signs of neglect and negligence:

- Frequent hunger
- Hiding, concealing or stealing food
- Poor personal hygiene
- Constant fatigue
- Inappropriate clothing (e.g. summer clothes in winter)
- Frequent delays or truancy
- Untreated health problems
- Lack of confidence
- Lack of social contacts
- Kleptomania
- Drug or alcohol use

Possible signs of sexual abuse:

- Age-inappropriate sexual behaviour or strong sexual language
- Contamination on the bed
- Anal or genital pain
- Sleep problems
- Excessive fear of adults
- Promiscuity

Possible signs of adult-related suspicions:

- An adult person in whose presence the child's behaviour changes significantly - e.g. the child becomes withdrawn, fearful, anxious or upset;
- An adult who asks a child to lie or keep a secret;
- An adult who violates any of the principles or measures of the Foundation's Protection Policy and/or Code of Conduct.

Annex 3 job advertisement template**Job advertisement template**

TITLE OF POSITION

A brief introduction to the Carpathian Foundation:

Brief summary of the job, position:

Objective: (The substantive focus of the work, which includes the scope, depth and difficulty of the work, both conceptual and applied)

Commitment: (Focuses on internal and external interaction for performing the service, seeks collaboration and builds effective partnerships)

Job duties, expectations, qualifications, etc:

Contract duration: XXXXX (with possibility of extension)

Commitments on protection:

The Carpathian Foundation has a zero tolerance policy towards sexual exploitation and abuse of children and adults, and towards violations of its Code of Ethics. Therefore, all job seekers (applicants) are expected to accept the Foundation's Protection Policy (linked) and its terms and conditions and to allow the Foundation to carry out reference and background checks during the recruitment process.

The Carpathian Foundation has a zero tolerance policy towards sexual exploitation and abuse of children and adults. In the selection process, the Foundation uses a range of procedures and measures, including references and the certificate of good conduct, to better protect children and vulnerable adults and prevent abuse.

The Carpathian Foundation has strict child protection principles and a zero tolerance policy towards sexual harassment, exploitation and abuse in all settings.

TENDER PROCEDURE

If you match the above description and are interested in this exciting opportunity, please send your application by e-mail to cfhu@cfoundation.org by xx.

All applicants must upload a cover letter and a CV, along with the references requested (names and contact details of at least two previous employers who can be contacted).

The Carpathian Foundation is committed to gender equality, and we welcome applications from both men and women.

Annex 4

What to do if a vulnerable adult or child reports sexual abuse to the Foundation staff?

- Give priority to the needs, wishes and choices of the person concerned. Ensure that the person concerned makes all decisions about accessing services and sharing information about their case.
- Do not share any information with other parties without the prior, informed, free and voluntary consent of the data subject.
- If the person concerned is a child and the family/guardian is making decisions on their behalf, ensure that the best interests of the child are paramount. The accompanying adult should preferably be chosen by the child.
- Believe the person concerned and reassure them that what happened is not their fault. Make sure that you and the person concerned are safe from immediate danger.
- Provide practical care and support (e.g. offer water, a place to sit, etc.).
- Put aside your own prejudices and listen to the person concerned, without asking questions.
- Respect the right of the person concerned to make their own decisions.
- Provide reliable and complete information on the services and support available.

- Limit the number of people who become aware of the incident. Respect the data subject's right and wishes to confidentiality.
- Do not blame, doubt or contradict the person concerned.
- Do not pressure the person concerned to share more details about the case, do not start an investigation or give advice.
- Do not mediate between the person concerned and the perpetrator or a third person (e.g. a family member).
- Do not record details of the incident or personal information.
- Do not assume that you know what the person concerned wants or needs. Certain actions may put the person at risk of further stigmatisation, retaliation or harm.

More information available from:

Boglárka Bata

Managing Director

Designated Protection Officer

Carpathian Foundation

3300 Eger, Felvégi u. 53.

boglarka.bata@cfoundation.org

+36-36-516-750

www.karpatokalapitvany.hu

www.carpathianfoundation.org

Sándor Köles

Chairperson of the Board of Trustees

Deputy Protection Officer

Carpathian Foundation

3300 Eger, Felvégi u. 53.

sandor.koles@cfoundation.org

+36-36-516-750

www.karpatokalapitvany.hu

www.carpathianfoundation.org